CEQA FINDINGS OF FACT
FOR THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
ANTELOPE VALLEY AREA PLAN EIR

STATE CLEARINGHOUSE NO. 2014061043

I. BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA and the specific reasons for considering the project acceptable even though the project has significant impacts that are infeasible to mitigate.

The lead agency is responsible for the adequacy and objectivity of the EIR. The County of Los Angeles (County), as lead agency, has subjected the Draft EIR (DEIR) and Final EIR (FEIR) to the agency's own review and analysis. The Board of Supervisors certifies that the DEIR, FEIR, and Findings of Fact reflect the independent judgment of the County.

A. PROJECT SUMMARY

The Proposed Project is a comprehensive update of the 1986 Antelope Valley Area Plan. The project includes updated goals and policies, identification of implementing programs and associated zoning consistency and ordinances as well as a new Land Use Policy Map for the area covered by the Proposed Area Plan (Project Area).

The Proposed Project identifies 1) Rural Preserve Areas, where residential densities would be reduced to protect important ecological and agricultural resources as well as minimize development in very high hazard areas; 2) Rural Town Areas, where maximum residential densities and minimum lot sizes would be established to preserve rural character; 3) Rural Town Centers, where urban commercial uses would be discouraged but rural commercial uses would be incentivized; and 4) Economic Opportunity Areas (EOAs), where plans for major infrastructure development are underway that create opportunities for economic growth and development than what is currently existing on the ground. The Proposed Area Plan anticipates that future planning may be needed in these areas to determine any appropriate land use and zoning changes needed when these infrastructure projects are completed.

As a component of the Los Angeles County General Plan, the Proposed Area Plan would refine the countywide goals and policies in the Adopted General Plan by addressing specific issues relevant to the Project Area, such as community maintenance and appearance, preservation of rural character, open space, and agricultural lands, and provides more specific guidance on elements already found in the Adopted General Plan. All issues not covered in the Proposed Area Plan are addressed by the Adopted General Plan.

As stated above, the Proposed Area Plan would replace all elements, including the Land Use Policy Map, of the Adopted Area Plan. In addition, the adoption of the Area Plan will also amend the Adopted General Plan to reflect updated policy maps regarding the Highway Plan, hazards and resources, and Significant Ecological Areas (SEAs), etc. The Proposed Project will also include an expansion of the proposed boundaries of the SEAs in the Antelope Valley. These updated SEA boundaries are one of the main underpinnings of the proposed Land Use Policy Map of the

Proposed Area Plan and are thus integrally incorporated into the Land Use Policy Map as indicated in Maps 2.1 through 2.3 of the Proposed Area Plan.

Components of the Proposed Area Plan

The Proposed Area Plan is organized into the following chapters:

- **Introduction.** This chapter presents the Proposed Area Plan's purpose and values, the geographic area, and the communities' vision statement.

- **Land Use Element.** This chapter discusses how the communities' vision translates into a development pattern through the concept of land use. The element contains two major components: the land use goals and policies, and the Land Use Policy Map. Proposed goals and policies articulate how the Area Plan's vision statement, Rural Preservation Strategy and incorporation of EOAs would be achieved by setting out intended land use outcomes. As a visual reflection of these goals and policies, the Land Use Policy Map identifies the types, locations and development intensities of land uses for unincorporated areas of the Project Area.

- **Mobility Element.** This chapter describes the multimodal approach to moving around the Project Area. This element creates a framework for a balanced, multi-modal transportation system in the Project Area through goals and policies that address three topics: regional movement of services and goods, local transportation meeting the needs of residents, and the balance required to meet the demands of both.

- **Economic Development Element.** This chapter discusses the ways that economic activities can be promoted in the Antelope Valley in a sustainable and ecologically sensitive manner. The chapter aims to balance economic growth with the preservation of the Project Area's unique rural character and environmental resources.

- **Conservation and Open Space Element.** This chapter describes conservation efforts to address potential threats to natural resources. Goals and policies are provided to protect the region's environmentally significant undisturbed natural spaces, make use of natural resources, and provide open space areas for recreation and enjoyment. The element identifies the resources and open spaces which may be developed, and gives guidance as to how sustainable land development can be conducted in the future. In addition, it identifies areas that are to be preserved from development, or are unsuitable for development due to hazards.

- **Public Safety, Services, & Facilities Element.** This chapter provides measures to ensure services are in place to maintain the safety and welfare of residents. Goals and policies outline strategies intended to fulfill the County's mission to "enrich lives through effective and caring service." The element identifies local hazards related to fires, geology, and floods. It also elaborates on community expectations for local services that include law enforcement, parks, schools, libraries, health facilities, and economic development.

- **Community-Specific Land Use Concepts.** This chapter highlights each established town and describes its land use form in more detail. The chapter attempts to provide expectations for how each rural community may change and grow throughout the life of the Proposed Area Plan.

Land use concepts specify the desired land uses for each community and identify potentially incompatible land uses that would not be desirable. The chapter is intended to be used by residents, stakeholders, and decision-makers when considering the appropriateness of land use development projects, infrastructure improvements, and conservations efforts.

- **Plan Implementation.** This chapter describes future planning activities that will be undertaken to further implement the goals and policies described in the Proposed Area Plan. This chapter aims to provide the general framework for these activities as a guide for the County and the public in pursuing these implementing planning activities in the future.

Policy Highlights of the Proposed Area Plan

The following discussion describes the major land use strategies in the Proposed Area Plan, which are supported by goals, policies, programs, and strategic changes to the Land Use Policy Map.

Rural Preservation Strategy

The Proposed Area Plan includes a new "Rural Preservation Strategy" that addresses issues of regional significance in a manner that builds upon the communities' vision statement and is based on four types of environments–rural town center areas, rural town areas, rural preserve areas, and EOAs–that serve different purposes.

- **Rural town center**s are the focal points of rural communities, accessible by a range of transportation options to reduce private vehicle trips, serving the daily needs of residents, and providing local employment opportunities. These areas would be designated for commercial and/or industrial use as they are in the Adopted Area Plan, but some of these areas would also allow a mix of commercial and residential uses.

- **Rural town areas** provide a transition between rural town center areas and rural preserve areas. They are occupied by a mix of residential and light agricultural uses. The majority of new residential development should be directed to these areas, provided that such development is consistent with the existing community character and allows for light agricultural, equestrian, and animal-keeping uses where appropriate. Accordingly, allowable residential densities in these areas would generally be equal to, or greater than, allowable residential densities in the Adopted Area Plan. These areas would provide transportation linkages to rural town center areas and other nearby destination points.

- **Rural preserve areas** are the portions of the Project Area which are currently largely undeveloped and are generally not served by existing infrastructure and public facilities. Many of these areas contain Special Management Areas, such as SEAs, Agricultural Resource Areas, and Seismic Hazard Zones as defined in the Adopted General Plan. Therefore, residential development in these areas should be limited to single-family homes at very low densities. Accordingly, allowable residential densities in these areas would generally be far less than allowable residential densities in the Adopted Area Plan. These areas are less likely to benefit from increased property tax revenues and developer fees, which may make it difficult to fund additional infrastructure, such as major roadways, water lines, and sewer lines. The Rural Preservation Strategy acknowledges this by directing additional infrastructure to rural town

center areas and rural town areas, where the placement of additional infrastructure would be more cost-effective and would generally have fewer effects on the environment.

Economic Opportunity Areas (EOAs)

The Proposed Area Plan also identifies three EOAs. These are areas where plans for major infrastructure projects are underway that would create conditions for development vastly different than currently existing on the ground. Because of ongoing plans by Los Angeles County Metropolitan Transportation Authority (Metro) and the California Department of Transportation (Caltrans) to build the High Desert Corridor Project in the eastern Antelope Valley, and the Northwest 138 Corridor Improvement Project in the western Antelope Valley, the Area Plan identifies three EOAs:

- **East EOA.** This area encompasses the communities of Lake Los Angeles, Sun Village, Littlerock, Pearblossom, Llano and Crystalaire.

- **Central EOA.** This area is located along Avenue D, just north of Fox Field Airport and west of the CA-14 Freeway.

- **West EOA.** This area is located along Highway 138 east and west of the California Aqueduct and including portions of Neenach.

The Proposed Area Plan includes an implementation program for future community plans if warranted, to further analyze the effects of planned infrastructure projects in these areas, and recommend land use and zoning changes and revised policies as necessary. Prior to any master-planned development approval in the West EOA, a specific plan or other similar planning document is required to ensure orderly development.

Special Management Areas

The county's existing Special Management Areas require additional development regulations that are necessary to prevent the loss of life and property, and to protect the natural environment and important resources. Special Management Areas include but are not limited to Agricultural Resource Areas, Airport Influence Areas, Seismic Hazard Zones, Flood Hazard Zones, SEAs, Hillside Management Areas, and Very High Fire Hazard Severity Zones. The Proposed Project minimizes risks to hazards and limits development in Special Management Areas through refined goals, policies, and programs from the Adopted General Plan.

- **Agricultural Resource Areas (ARAs)** are areas where the Proposed Project promotes the preservation of agricultural land. These areas are protected by policies to prevent the conversion of farmland to incompatible uses.

- **Significant Ecological Areas (SEAs)** include undisturbed or lightly disturbed habitat supporting valuable and threatened species, linkages and corridors to promote species movement, and are sized to support sustainable populations of its component species. The objective of the SEA Program is to preserve the genetic and physical diversity of the County by designing biological resource areas capable of sustaining themselves into the future. However SEAs are not wilderness preserves. Much of the land in SEAs is privately held, used for public recreation or abutting developed areas. Thus the SEA Program is intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities

and development projects that are incompatible with the long term survival of the SEAs. As part of the proposed Countywide General Plan Update, an update to the existing SEAs Ordinance has been proposed. Although the SEA Ordinance update is not part of this Proposed Project, the updated SEA boundaries are part of the Proposed Project and the Proposed Land Use Policy Maps are based on the updated boundaries.

- **Hillside Management Areas (HMAs)** are areas with a natural slope gradient of 25 percent or steeper. The adopted provisions regulating HMAs ensure that development preserves the physical character and scenic value in HMAs.

Zoning Consistency

Proposed Zoning Map Amendments

To maintain consistency between the updated Area Plan Land Use Policy Map and the Zoning Map, rezoning is necessary where the proposed land use designation would no longer be consistent with Area Plan Land Use Policy Map. The Area Plan Land Use Policy Map establishes the long-range vision for general intended uses. In addition, the zoning consistency program also includes amendments to the Zoning Code. Title 22 (Planning and Zoning) of the Los Angeles County Code (Zoning Code herein) and Zoning Map implement that vision by providing details on specific allowable uses. A complete description of the proposed land use and zoning changes is included in Appendix C to the DEIR.

Proposed Amendments to the Zoning Code

To implement goals and policies included in the Proposed Area Plan and to ensure zoning consistency, revisions to the Zoning Code will be part of the Proposed Project. These include the creation of the following two new zones, which are included in their entirety in Appendix D of the DEIR:

- **C-RU (Rural Commercial) Zone:** Zone C-RU provides detailed uses, development standards, and procedures for low-intensity commercial uses that are compatible with rural, agricultural, and low-density residential uses. The intent of the zone is to serve the diverse economic needs of rural communities, while preserving their unique characters and identities.

- **MXD-RU (Rural Mixed Use) Zone:** Zone MXD-RU provides detailed uses, development standards, and procedures for a limited mix of commercial uses and very low-density multifamily residential uses on the same lot within rural town centers.

Additional amendments to Title 22 of the County Code would do the following:

- Add overall applicability language for pending and approved applications under the Proposed Project.
- Update applicability criteria for the existing provisions regulating SEAs.
- Add "museums" and "zip-lines" to the list of uses allowed in the C-R (Commercial-Recreation) Zone.

Physical Development under the Proposed Project

Pursuant to CEQA Guidelines Section 15064(d), this DEIR determines whether there are direct physical changes and reasonably foreseeable indirect physical changes in the environment that would be caused by the Proposed Project. Specifically, the DEIR focuses on impacts from changes to land use associated with buildout of the proposed land use maps and impacts from overall population and employment growth in the Project Area. The ultimate development of unincorporated areas is not tied to a specific timeline.

Buildout projections for the Proposed Project are shown in Table 1, *Buildout Projections for the Proposed Area Plan*. These buildout projections are used throughout this DEIR to estimate the magnitude of development that would likely occur within the Project Area upon buildout of the Proposed Project. The total acreage for each land use designation is used to estimate the number of dwelling units, residents, square feet of nonresidential uses, and jobs that would be generated. These projections are used extensively in the analysis of potential project impacts such as increases in air quality, noise, and traffic. Please refer to Appendix E of the DEIR for a complete description of the buildout methodology.

It is impossible to perfectly predict the exact amount, timeline, or distribution of development that would occur under the Proposed Project. However, the estimates in Table 1 allow for analysis of potential impacts on a programmatic level.

As shown in Table 1, buildout of the Project Area consistent with the Proposed Project would result in approximately 81,441 additional housing units in the Project Area compared to existing conditions. These new units would generate approximately 311,920 additional residents. Buildout of the Project Area consistent with the Proposed Project would also result in a 39 percent increase in nonresidential (commercial and industrial) space. New employment-generating land uses would result in an increase of approximately 102,513 more jobs than under existing conditions.

Table 1 Buildout Projections for the Proposed Project

Proposed Land Use	Acres	Dwelling Units	Population	Nonresidential Floor Area (sq. ft.)	Employment
CR – Rural Commercial	1,793	-	-	19,508,183	38,376
MU-R – Rural Commercial/Mixed Use	693	1,386	5,337	3,773,743	7,385
H2 – Residential 2	4,562	7,299	28,101	-	300
H5 – Residential 5	6,687	26,748	102,978	-	-
H9 – Residential 9	453	3,264	11,752	-	-
H18 – Residential 18	121	1,737	6,253	-	-
H30 – Residential 30	84	2,013	5,615	-	-
IH – Heavy Industrial	1,980	-	-	16,060,113	14,575
IL – Light Industrial	4,173	-	-	90,884,331	69,590
OS-BLM – Bureau of Land Management	9,002	-	-	-	-
OS-C – Conservation	19,670	-	-	-	-
ML – Military Land	41,779	-	-	-	-
OS-NF – Open Space National Forest	499,734	-	-	-	50
OS-PR – Parks and Recreation	19,315	-	-	-	346
W – Water	11,038	-	-	-	-
P – Public and Semi-Public	19,870	-	-	-	3,175
RL1 – Rural Land 1	10,242	10,242	39,431	-	2
RL2 – Rural Land 2	30,833	15,417	59,354	-	400
RL5 – Rural Land 5	36,329	7,266	27,973	-	-
RL10 – Rural Land 10	204,000	20,400	78,540	-	100
RL20 – Rural Land 20	208,187	10,409	40,076	-	50
Total	1,130,544	106,180	405,410	130,226,370	134,351
Existing		24,739	93,490	93,125,468	31,838
Increase Over Existing		81,441	311,920	37,100,902	102,513

Note: Historically, jurisdiction-wide build-out levels do not achieve the maximum allowable density/intensity on everyparcel and are, on average, lower than allowed by the proposed Area Plan. Accordingly, the build-out projections in this Area Plan do not assume build-out at the maximum density or intensity and instead are adjusted downward to account for variations in build-out intensity.

B. PROJECT OBJECTIVES

As identified in the Proposed Area Plan, the following vision statement has been established for the Project Area:

> The Antelope Valley region is a wonderful place to live, work, play, and raise a family. The Valley is a mosaic of unique small towns in which rural lifestyles are cherished. These diverse towns are unified by an extraordinary environmental setting that includes agricultural lands, natural open spaces, expansive mountain views, diverse ecological habitats, and dark night skies. The Valley's network of trails, roads, and transit link these dispersed towns to each other and to a wide offering of local-serving businesses and quality social, educational, cultural, and recreational services and facilities.
>
> Residents, business owners, and property owners collaborate with a responsive local government to ensure that life in the Antelope Valley region will continue to be exciting, enjoyable, and rewarding. The growing population's need for additional housing and employment opportunities is balanced against the need to respect historical heritage and preserve the natural environment. Public improvements and

> private developments are sustainable, conserving available resources and relying on alternative energy sources, and complement the small scale of existing rural towns. A wide array of activities and opportunities for youth ensure that the Valley's high quality of life will be sustained for future generations.

In addition to the above vision statement, the following objectives were established for the Proposed Project:

- Preservation and enhancement of each unique town's rural character, allowing for continued growth and development without compromising the rural lifestyle.

- Preservation of open space around existing towns in order to preserve hillside areas and significant ridgelines, conserve biological resources, provide opportunities for recreation, and make more efficient use of existing infrastructure in the core areas.

- Planning for integrated circulation systems, including bikeways, walkways, and multi-purpose trails.

- Conservation of significant resources, including agricultural lands, mineral resources, water supply, and scenic areas.

- Preservation of public health, safety, and welfare, through identification of natural and environmental hazards, including noise, seismic, fire, and airborne emissions, and designation of land uses in an appropriate manner to mitigate these impacts.

- Coordination on enhancing public and community services such as law enforcement, fire protection, and parks; and

- Provide a balance of jobs and housing consistent with Assembly Bill (AB) 32, Senate Bill (SB) 375, and Southern California Association of Government's (SCAG's) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

C. ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the County of Los Angeles CEQA Guidelines, the County conducted an extensive environmental review of the proposed project.

- The County determined that an EIR analyzing all environmental impacts would be required for the proposed project and issued a Notice of Preparation (NOP) on June 12, 2014. The public review period extended from June 12, 2014 to July 11, 2014.

- Based on CEQA Appendix G: Environmental Checklist Form, the County staff determined that a Draft EIR (DEIR) should be prepared for the Proposed Project. The scope of the DEIR was determined based on Appendix G of the CEQA Guidelines, comments received in response to the NOP, and comments received at two scoping meetings conducted by the County on June 26, 2014 (in Lancaster) and July 7, 2014 (in downtown Los Angeles). Section 2.3 of the DEIR describes the issues identified for analysis in the DEIR.

- The County prepared a DEIR, which was made available for a 45-day public review period beginning August 22, 2014 and ending October 6, 2014.

- The County prepared a Final EIR (FEIR), including the Response to Comments to the DEIR, the Findings of Fact, and the Statement of Overriding Considerations. The FEIR/Response to Comments contains comments on the DEIR, responses to those comments, revisions to the DEIR, and appended documents.

- The County held public hearings on the Proposed Project, including a Regional Planning Commission hearing on September 27, 2014, and a Board of Supervisors hearing on November 12, 2014.

D. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the Proposed Project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by the County in conjunction with the proposed project;

- The FEIR for the proposed project;

- The DEIR;

- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR;

- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR;

- All written and verbal public testimony presented during a noticed public hearing for the proposed project;

- The Mitigation Monitoring and Reporting Program;

- The reports and technical memoranda included or referenced in the Response to Comments;

- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and FEIR;

- The Resolutions adopted by the County in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto;

- Matters of common knowledge to the County, including but not limited to federal, state, and local laws and regulations;

- Any documents expressly cited in these Findings; and

- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

E. CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the County's actions related to the project are at the Los Angeles County Department of Regional Planning, 320 W. Temple Street, Room 1354, Los Angeles, CA 90012. The County Department of Regional Planning is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the Department of Regional Planning. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

II. FINDINGS AND FACTS

The County, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the DEIR and FEIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

> (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
>
> 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the FEIR.
>
> 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
>
> 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.
>
> (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
>
> (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.

(d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

(e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.

(f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The "changes or alterations" referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.

(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

(c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.

(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

(e) Compensating for the impact by replacing or providing substitute resources or environments.

III. FINDINGS AND FACTS REGARDING IMPACTS

This section of the document is divided into the following parts:

- Part A, *Impacts Determined to Be Less Than Significant*, presents the impacts of the proposed project that were determined in the EIR to be less than significant without the addition of mitigation measures and presents the rationales for these determinations.

- Part B, *Impacts Mitigated to Less Than Significant*, presents significant impacts of the proposed project that were identified in the FEIR, the mitigation measures identified in the Mitigation Monitoring and Reporting Program, and the rationales for the findings.

- Part C, *Significant Unavoidable Impacts*, presents significant impacts of the proposed project that were identified in the FEIR, the mitigation measures identified in the Mitigation Monitoring and Reporting Program (if available), the findings for significant impacts, and the rationales for the findings.

Because of the environmental analysis of the project and the identification of relevant Adopted General Plan policies; compliance with existing laws, codes, and statutes; and the identification of feasible mitigation measures, some potentially significant impacts have been determined by the

County to be reduced to a level of less than significant, and the County has found—in accordance with CEQA Section 21081(a)(1) and State CEQA Guidelines Section 15091(a) (1)—that "Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment. This is referred to herein as "Finding 1." Where the County has determined—pursuant to CEQA Section 21081(a)(2) and State CEQA Guidelines Section 15091(a)(2)—that "Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency," the County's finding is referred to herein as "Finding 2." Finding 2 is not utilized in this findings document.

Where, as a result of the environmental analysis of the project, the County has determined that either: (1) even with the compliance with existing laws, codes and statutes, and/or the identification of feasible mitigation measures, potentially significant impacts cannot be reduced to a level of less than significant, or (2) no feasible mitigation measures or alternatives are available to mitigate the potentially significant impact, the County has found in accordance with CEQA Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3) that "Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report." This is referred to herein as "Finding 3."

A. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT

The County determined that all environmental topics in the Environmental Checklist (CEQA Guidelines Appendix G) would have the potential to result in significant impacts. Thus, an Initial Study was not prepared and a Notice of Preparation for the Proposed Project was issued on June 12, 2014. All environmental topics were therefore determined to require full assessment in the DEIR.

Draft EIR

This section identifies environmental impacts of the proposed project determined to be less than significant without implementation of project-specific mitigation measures. This determination, however, does assume compliance with existing regulations as detailed in Chapter 5 of the DEIR.

1. Aesthetics

Impact 5.1-1: Implementation of the Proposed Project would alter existing views of scenic vistas.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-19 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project has the potential to result in adverse impacts to scenic vistas. New development would partially obstruct or interrupt viewsheds that were previously unobstructed. However, the existing regulatory setting, as well as the goals and policies in the Proposed Area Plan, would serve to lessen potential impacts to scenic vistas associated with implementation of the Proposed Project. Additionally, approval of the Proposed Project itself does not authorize construction of development that would affect scenic vistas. Therefore, impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and conditions of approval for any future discretionary projects, this impact would be less than significant.

Impact 5.1-2:	Implementation of the Proposed Project would not substantially alter scenic resources with a state scenic highway.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-26 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

There is only one adopted state scenic highway in the Project Area: the Angeles Crest Highway (SR-2). Another highway in the Project Area is identified as being eligible for such a designation in the future: SR-39 between I-210 and the Angeles Crest Highway. Both of these roadways are located in the San Gabriel Mountains in the Angeles National Forest. The Proposed Project does not introduce new development capacity near the Angeles Crest Highway or SR-39, nor does it propose any other changes for the corridors that they traverse. The areas that the roadways travel through would remain protected natural areas at buildout of the Proposed Project. Therefore, implementation of the Proposed Project would not alter scenic resources within a state scenic highway.

The Proposed Project includes a Scenic Drives Map that identifies 53 routes in the region as "scenic drives." While many of these routes are located entirely within the Project Area, several extend into the cities of Lancaster or Palmdale, or into other areas of Los Angeles County. Most of the scenic drives are located in mountainous areas or at the south edges of the Antelope Valley. Some of the routes are located in areas targeted for growth under the Proposed Project, including Rural Town Centers. However, the Proposed Area Plan includes goals and policies that would protect scenic views along the designated corridors. In particular, implementation of Policy COS 5.7 would ensure that development standards and guidelines are established for development within the viewsheds of scenic drives.

As stated above, implementation of the Proposed Project would not alter scenic resources within a state scenic highway. Impacts would be less than significant.

Finding:

Upon implementation of programs identified in the Proposed Area Plan as well as regulatory requirements, this impact would be less than significant.

Impact 5.1-3:	Implementation of the Proposed Project would alter the existing visual character of portions of the Project Area and its surroundings.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-26 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would have the potential to result in changes to the visual character of the Project Area, primarily related to the overall magnitude of growth anticipated. However, at a programmatic level, the land use patterns and development types allowed in the Project Area by the Proposed Area Plan are designed to maintain the region's rural character. Furthermore, the implementation of guidelines and development standards in the existing regulatory

framework would serve to lessen the potential impacts of the Proposed Project by providing consistency between existing and future development. Additionally, the goals, policies, and implementation programs contained in the Proposed Area Plan would lessen or mitigate potential impacts of the Proposed Project by providing direction for future decision making, as well as by requiring additional future review of potential impacts of individual development projects that would be accommodated by the Proposed Project. Therefore, while changes to the region's visual appearance and character would occur, these would not be inherently adverse changes. Impacts related to visual character and quality would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.1-4: Implementation of the Proposed Project would generate additional sources of light and glare that could adversely affect day and nighttime views in the Project Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.1-31 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

Because buildout of the Proposed Project would result in the construction of additional development throughout the Project Area, its implementation would generate additional sources of light and glare that could adversely affect existing day and nighttime views. However, most growth would occur in established communities where existing levels of nighttime illumination are high. Elsewhere, growth would occur at the type of very low densities that would not create excessive light pollution. Solar facilities and other energy projects could be considered as part of buildout of the Project Area, and these facilities could add glare. A separate County effort is underway to prepare a Renewable Energy Ordinance that regulates solar and wind renewable energy systems and facilities for on-site and off-site use as well as temporary meteorological towers. Any impacts related to light and glare associated specifically with renewable energy will be separately analyzed as part of that project's environmental document. The Proposed Area Plan specifically addresses visual impacts, including energy projects, and includes policies to minimize such potential impacts. Furthermore, these and other individual projects that would have potentially significant impacts related to lighting, such as large industrial buildings, would be subject to project-level CEQA review.

Although growth in the Antelope Valley (and other rural areas) could potentially diminish existing nighttime views and/or dark skies, these impacts would be minimized by applicable regulations. Applicable regulations include the County's Rural Outdoor Lighting District Ordinance, which specifies regulations for much of the Project Area to shield and minimize outdoor lighting and its negative effects. Upon implementation of applicable sections of the County Code, provisions of the County Building Code, and goals and policies in the Proposed Area Plan, impacts related to light and glare would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Scenic Vistas and Scenic Resources

Support for this environmental impact conclusion is fully discussed starting on page 5.1-33 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

Growth anticipated in the subregion could affect scenic vistas and specific scenic resources. However, because development allowed under the Proposed Project would be subject to goals, policies, and regulations that reduce impacts of the Proposed Project on scenic resources to a less than significant level, the Proposed Project's contribution to subregion-wide impacts would not be cumulatively considerable. Cumulative impacts of the Proposed Project related to scenic vistas and scenic resources are therefore considered less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Visual Character and Quality

Support for this environmental impact conclusion is fully discussed starting on page 5.1-34 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

During the planning period of the Proposed Project, growth and development would fundamentally alter visual character and quality in some areas of the region. However, because development allowed under the Proposed Project would be subject to goals, policies, and regulations that reduce impacts of the Proposed Project on visual character and quality to a less than significant level, the Proposed Project's contribution to subregion-wide impacts would not be cumulatively considerable. Cumulative impacts of the Proposed Project related to visual character and quality are therefore considered less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Light and Glare

Support for this environmental impact conclusion is fully discussed starting on page 5.1-34 of Section 5.1, *Aesthetics*, of the DEIR.

Facts in Support of Finding:

The construction and operation of cumulative projects located in the subregion would also have the potential to result in a new source of light and glare from new development or redevelopment that requires night lighting, such as security lighting in commercial areas, or is constructed with materials that would result in glare, such as expanses of glass on office buildings. Glare could also be generated by new solar projects allowed in parts of the region outside the Project Area. However, impacts from light and glare are generally localized and not cumulative in nature. Although a cluster of solar projects straddling the boundaries of the Project Area and an adjacent city—Lancaster or Palmdale—

could generate cumulative effects in the form of "shimmer" seen from long distances, implementation of Proposed Area Plan policies would reduce the Project Area's contribution to these impacts to less than significant (see Impact 5.1-4, above). Therefore, the Proposed Project is not anticipated to substantially contribute to a significant adverse cumulative effect related to glare. A separate County effort is underway to prepare a Renewable Energy Ordinance that regulates solar and wind renewable energy systems and facilities for on-site and off-site use as well as temporary meteorological towers. Any impacts related to light and glare associated with renewable energy will be separately analyzed as part of that project's environmental document. Furthermore, as in the Project Area, discretionary solar projects in Lancaster and Palmdale would be subject to subsequent environmental review under CEQA. Consistent with CEQA, this environmental review would include, where necessary, analysis of potential aesthetic impacts, including potential cumulative glare-related impacts generated by the proposed project in combination with existing nearby solar facility projects. Therefore a significant cumulative impact related to glare would not occur.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

2. Agriculture and Forestry Resources

Impact 5.2-2:	The Proposed Project would not conflict with existing zoning for agricultural uses, or a Williamson Act Contract.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-15 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Proposed Zoning Changes

The Proposed Project includes establishment of two new zones:

- **C-RU (Rural Commercial) Zone:** would permit low-intensity commercial uses that are compatible with rural, agricultural, and low-density residential uses. The intent of the zone is to serve the diverse economic needs of rural communities, while preserving their unique characters and identities.

- **MXD-RU (Rural Mixed Use) Zone:** would permit a limited mix of commercial uses and very low-density multifamily residential uses on the same lot within rural town centers.

The proposed C-RU and MXD-RU Zones are within the proposed CR (Rural Commercial) and MU-R (Rural Commercial/Mixed Use) designations. Buildout of the Project Area consistent with the Proposed Area Plan would convert land within each of these two zones to nonagricultural uses. Such conversion would be part of the potential conversion of 128 acres of mapped Important Farmland within the CR designation and of 13 acres within the MU-R designation. There are about 30,566 acres of mapped Important Farmland in the Project Area, including unincorporated and incorporated areas. The total conversion of 141 acres of mapped Important Farmland to non-agricultural use would be less than significant in comparison to the total acreage of Important Farmland in the Project Area.

Williamson Act Contracts

No Williamson Act contracts are in effect in the Project Area. No impact to Williamson Act contracts would occur.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.2-3: The Proposed Project would not conflict with zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-15 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California Public Resources Code Section 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code Section 4526). The Los Angeles County Zoning Code does not contain zones specifically for forest use or production of forest resources. Additionally, forest use is not specified as a permitted use in any of the three agricultural zones.

As the County has no existing zoning specifically designating forest use, implementation of the Proposed Project would not conflict with existing zoning for forest land or timberland. No impact would occur.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.2-4: The Proposed Project will not result in the loss of forest land or conversion of forest land to nonforest use.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-16 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Forests in the Project Area are largely limited to narrow formations along creeks and other watercourses and the highest elevations of the San Gabriel Mountains. The largest concentration of forest is in the Angeles National Forest (ANF), which covers 25 percent of the land area of Los Angeles County. Despite the large extent of the ANF, very little of its area contains forests or woodlands as defined by the California Public Resources Code. Most of the land area in the ANF is chaparral or similar scrub communities.

Coast live oak riparian forest occurs in narrow formations along watercourses. Southern cottonwood-willow riparian forest occurs in frequently flooded lands along perennially wet reaches of streams (UCSB 1998). These plant communities would be protected by existing regulations, including Sections 1600 et seq. of the California Fish and Game Code. Mitigation measures set forth in Section 5.4 of this DEIR would reduce impacts to these natural communities from projects approved under the Proposed Project.

Oak riparian forest occurs in canyons at higher elevations. Many of the higher-elevation canyons in the Project Area are already protected within the Angeles National Forest. In addition, some oak riparian forest is in riparian habitat jurisdictional to the California Department of Fish and Wildlife (CDFW).

Forest land within Los Angeles County is protected through the County's SEA provisions. Four SEAs, updated from the Adopted General Plan and part of the Proposed Project, are entirely within the Project Area: Antelope Valley, San Andreas, Joshua Tree Woodland, and Tujunga Wash/Hansen Dam SEAs. Four additional SEAs are partly within the Project Area: the Santa Clara River, Altadena Foothills and Arroyos, San Gabriel Canyon, and San Dimas Canyon/San Antonio Wash SEAs (see Figure 5.4-4, *Existing and Proposed Significant Ecological Areas*, in Section 5.4 of the DEIR). Compliance with the provisions for SEAs will reduce potential impacts to forest land to a less than significant level.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

3. Biological Resources

Impact 5.4-3:	The Proposed Project would impact federally protected wetlands as defined by Section 404 of the Clean Water Act (marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-83 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Los Angeles County supports a number of water bodies (e.g., Lake Hughes, Elizabeth Lake, Quail Lake, Palmdale Lake), several major dry lakes (Rosamond Dry Lake, Rogers Dry Lake, and Buckhorn Dry Lake), large intermittent streams (Big Rock Wash and Little Rock Wash), and numerous smaller streams and tributaries that support riverine and riparian habitat, including wetlands. The U.S. Fish and Wildlife Service wetlands mapper (http://www.fws.gov/wetlands/NWI/index.html) identifies a number of riverine wetlands (e.g., within the Big Rock and Little Rock alluvial drainages), freshwater emergent wetlands, and freshwater forested/shrub wetlands distributed broadly along the northern base of the San Gabriel Mountains within the Project Area. However, a large proportion of jurisdictional streams and wetlands in the County have not been not mapped and would need to be identified and delineated during individual project-level reviews. Individual projects considered for approval as part of the buildout of the Project Area under the Proposed Project could impact these habitats.

Three key agencies regulate activities within inland streams, wetlands, and riparian areas in California: the United States Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB). Any project that involves permanently or temporarily impacting jurisdictional

waters and/or wetlands through filling, stockpiling, construction access, conversion to a storm drain, channelization, bank stabilization, road or utility line crossings, geotechnical investigations, or any other modifications that involve the discharge of fill and/or alteration of a jurisdictional resource, will likely require permits from the USACE, CDFW, and/or RWQCB before any land disturbance can commence. Both permanent and temporary impacts are regulated by the resource agencies.

The Project area contains 16 SEAs, many of which contain riparian habitats and wetlands that receive some protection under the existing SEA Ordinance. The Proposed Project includes substantial enlargement of the SEAs in the Project Area, from 134,745 acres to 356,773 acres, which will expand the land area of wetlands under protection. However, the SEAs do not guarantee preservation, nor do they protect all wetland habitats that occur in the Project Area.

Development of properties adjacent to riparian communities or other wetland habitats should be designed to protect water quality and the riverine biological ecological functions. Wetlands and Waters of the U.S. that are under state and federal jurisdiction occur in the Project Area, however, the potential impacts to these by individual development projects will be analyzed on a project by project basis. Protection of wetland habitats where they occur throughout the Project Area will assist in the preservation of these resources within the Project Area. Best management practices during construction to minimize erosion and sedimentation will contribute to the protection of water quality. The Conservation and Open Space Element of the Proposed Area Plan outlines policies for the protection of wetlands and biological resources (see Section 5.4-3, 5.4.3, *Relevant Area Plan Goals and Policies*, above).

Implementation of these policies will have both direct and indirect beneficial effects for wetlands by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and emphasizing avoidance, minimization, and mitigation of impacts to wetland areas. However, the buildout of the Project Area consistent with the Proposed Project may impact wetland areas, and these impacts may have a significant adverse effect on wetlands through hydromodification, filling, diversion, or change in water quality.

Mitigation measure BIO–1 would ensure that, on a project-specific level, necessary surveys are conducted and a biological resources assessment is prepared to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. These surveys will allow the County to monitor and inventory wetlands within the Project Area. Any projects within an SEA will be subject to the existing SEA provisions and reviewed by SEA Technical Advisory Committee (SEATAC). In addition, for wetlands under the jurisdiction of the USACE, CDFW, and/or RWQCB, as well as waters and riparian habitat under their respective jurisdictions, permits and mitigation may be required, subject to the approval of the regulatory agencies. Furthermore, project locations with plant communities considered sensitive by the CDFW must be analyzed under CEQA. Thus, with implementation of these mitigation measures in combination with the requirements for regulatory permitting (e.g., Section 404 permitting and any associated mitigation requirements), impacts to wetlands would be considered less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.4-3:	The Proposed Project would require compliance with adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state policies or ordinances protecting biological resources.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-85 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Significant Ecological Areas (SEAs). The County's SEA Program seeks to preserve the genetic and physical ecological diversity of Los Angeles County by designing biological resource areas capable of sustaining themselves into the future. The SEA designation is given to land that contains irreplaceable biological resources and includes undisturbed or lightly disturbed habitats that support valuable and threatened species and linkages and corridors to promote species movement. The Proposed Project includes expansion of the number of SEAs in the Project Area, and the land area under SEAs from the current 134,745 acres to 356,773 acres. The expansion of the SEAs under the Proposed Project is based on the best available science and adheres to the overarching objectives of the SEA Program, in particular protecting the most sensitive biological resources in the Project Area, promoting the long-term sustainability of the SEAs, and ensuring landscape-level connectivity that promotes sustainability and wildlife movement. The Proposed Project is consistent with the SEA Program and Ordinance.

County Oak Tree Ordinance. The Oak Tree Ordinance regulates impacts to oak trees of 8 inches in diameter. The County adopted the Oak Woodlands Conservation Management Plan (OWCMP) in 2012, which develops a consistent policy for the management of oak woodlands. The OWCMP extends CEQA consideration of impacts to oak woodlands habitat comprised of oaks 5 inches or larger in diameter at 4.5 feet above the ground surface. The County Oak Tree Ordinance and OWCMP are applied on a project-specific level, and consistency with these plans will be determined on a project-by-project basis. The Proposed Project does not alter or contradict the Oak Tree Ordinance, and the Proposed Project includes expansion of oak woodlands protected under SEAs. The Proposed Project does not impact the County Oak Tree Ordinance.

County Oak Woodlands Conservation Management Plan (OWCMP). In 2012, the County adopted the OWCMP to encourage the preservation of oak woodlands throughout Los Angeles County. The County recently prepared the Oak Woodlands Conservation Management Plan Guide, which details the process by which the County will determine the extent of oak woodland habitat, the requirement for the preparation of an oak woodland report, an analysis of impacts to the extant oak woodland, and the need for mitigation for impacts to the oak woodland habitat. The County requires development projects to avoid impacts to oak woodlands and requires appropriate compensatory mitigation where development disturbs or removes such habitat. The policies of the Proposed Project do not conflict with the County Oak Tree Ordinance or OWCMP.

West Mojave Plan (WEMO). The WEMO is a habitat conservation plan (HCP) that encompasses most of California's western Mojave Desert and was adopted by the Bureau of Land Management (BLM) in 2006. Portions of Los Angeles County are located within the WEMO. However, the plan applies only to BLM public lands, as other agencies did not adopt the habitat conservation plan proposed in the WEMO to cover their jurisdictions. Therefore, the plan provisions have not been adopted by the County. The Proposed Project does not contain development plans within any area proposed for protection under the WEMO and is consistent with goals and policies of the WEMO.

Desert Renewable Energy Conservation Plan (DRECP). The DRECP is a proposed Natural Community Conservation Plan, HCP, and Land Use Plan Amendment for the Mojave and Colorado deserts, including portions of Los Angeles County. As a part of California's renewable energy

planning efforts, the DRECP is intended to provide effective protection and conservation for desert ecosystems by providing binding, long-term endangered species permit assurances and to facilitate the review and approval of compatible renewable energy projects. The DRECP will include implementation of a scientifically based adaptive management and monitoring program as a part of its overall conservation strategy. However, the DRECP is still in draft form and has not been formally adopted. The Proposed Project does not impact the DRECP.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Wetlands

Support for this environmental impact conclusion is fully discussed starting on page 5.4-85 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

For impacts to federally regulated wetlands, mitigation would ensure that unavoidable impacts to wetlands are mitigated with environmentally superior mitigation; thus, impacts to wetlands would be considered less than significant. Additionally, wetlands under the jurisdiction of the USACE, CDFW, and/or RWQCB are subject to permits and mitigation that may be required by the regulatory agencies. Presuming that impacts to wetlands would be similarly mitigated in other regions of the cumulative impacts study area, cumulative impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

4. Cultural Resources

Impact 5.5-3: Grading activities pursuant to buildout of the Proposed Project could potentially disturb human remains.

Support for this environmental impact conclusion is fully discussed starting on page 5.5-20 of Section 5.5, *Cultural Resources*, of the DEIR.

Facts in Support of Finding:

Impact Analysis: Results of both the archival research and archaeological reconnaissance indicate that the Project Area is within an area of high sensitivity for cultural resources, both prehistoric and historic. Prehistoric sites and cemeteries are reported west of the Tropico Mine, an area likely utilized by the Kitanemuk. Since implementation of the Proposed Project would involve ground-disturbing activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains.

Excavation during construction activities by projects consistent with the Proposed Project has the potential to disturb human burial grounds, including Native American burials, in undeveloped areas of the Project Area. Human burials have specific provisions for treatment in Section 5097 of the California Public Resources Code, which authorizes the Native American Heritage Commission to resolve any disputes related to the disposition of Native American burials. Public Resources Code

Section 5097.98 mandates the process to be followed in the event of a discovery of any human remains and would mitigate all potential impacts. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) also have provisions protecting human burial remains from disturbance, vandalism, or destruction. California Health and Safety Code Section 7050.5 requires that if human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation and made recommendations to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, compliance with these regulations would ensure impacts to human burial grounds remain less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

5. Geology and Soils

Impact 5.6-1:	Project Area residents, occupants, or structures could potentially be exposed to seismic-related hazards.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-17 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Rupture of a Known Earthquake Fault

As depicted on Figure 5.6-2 of the DEIR, several parts of the Project Area lie within State-mapped Alquist-Priolo Earthquake Fault Zones, the most notable of which is the San Andreas Fault Zone. Plan implementation would result in the construction of new residential, commercial, and light industrial structures. The siting of such buildings would have to comply with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act and the County Building Code, the purpose of which is to prevent the construction of residential buildings on top of the traces of active faults. Adherence to this law, and the associated setbacks from active fault traces, would help reduce the hazards associated with earthquake fault rupture to a less than significant level. Reducing the maximum residential densities in these areas, as proposed by the Proposed Project, would also help further reduce the hazards associated with earthquake fault rupture.

Strong Seismic Ground Shaking

Buildout of the Proposed Project would inevitably increase the number of residential buildings, commercial/light-industrial buildings, and residents, workers, and visitors to the area. The Antelope Valley is a very seismically active region. Strong ground shaking is very likely to occur in the Project Area during the useful lifetime of newly built or redeveloped buildings envisioned in the Proposed Area Plan. The Project Area contains several active and potentially active earthquake faults, the most significant of which are listed in Table 5.6-1 of the DEIR and shown on Figure 5.6-2 of the DEIR. Of the faults listed, the southern section of the San Andreas Fault is believed to be capable of generating the largest earthquake, potentially in excess of M_w 7.1. Although the maximum anticipated peak horizontal ground acceleration associated with these faults is approximately 0.50 g, the intensity of seismic shaking can be very location dependent. For example, vertical ground acceleration

associated with the 1994 Northridge Earthquake locally exceeded 1.0 g (i.e., more than the force of gravity) at certain monitoring stations.

Although strong seismic shaking is a risk throughout Southern California, the Project Area is not at greater risk of seismic activity or impacts than other areas. Additionally, the State regulates development through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The County Building Code contains building design and construction requirements that are intended to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards.

The County building regulations are included in the County Building Code. Future development plans consistent with the Proposed Project would be required to adhere to the provisions of the County Building Code, which are imposed on plan developments by the County during the building plan check and development review process. Each future development would be preceded by a detailed, site-specific geotechnical investigation. The geotechnical investigation would calculate seismic design parameters pursuant to County Building Code requirements, and would include foundation and structural design recommendations, as needed, to reduce hazards to people and structures arising from ground shaking. Compliance with the requirements of the County Building Code for structural safety during a seismic event would reduce the hazards associated with strong seismic ground shaking to a less than significant level.

Liquefaction

Implementation of the Proposed Project would increase numbers of residents, workers, visitors, and structures in the Project Area. Based on assessments of anticipated intensity and duration of seismic shaking; the origin, texture, and composition of shallow sediments; and the local presence of shallow groundwater, several parts of the Project Area have been mapped by the State as areas prone to seismically induced liquefaction as summarized in Table 5.6-3 of the DEIR and shown on Figure 5.6-2 of the DEIR. Future development plans considered for approval within the Project Area allowed by the Proposed Project could subject persons or structures to potentially significant hazards arising from liquefaction.

Although liquefaction zones have been mapped within the Project Area, future development pursuant to the Proposed Project would not result in increased risk of or exposure to liquefaction or other seismic-related ground failures. Geotechnical investigations for future development plans considered for approval by the County pursuant to the Proposed Project would be required to evaluate the potential for liquefaction and other seismic ground failure, such as lateral spreading, under the respective plan sites. Geotechnical investigation reports would provide recommendations for grading and for foundation design to reduce hazards to people and structures arising from liquefaction and other seismic-related ground failure. Future development plans for projects in Project Area would be required to adhere to existing building and grading codes, and construction-related grading requires the preparation and submittal of site-specific grading plans and geotechnical reports that must be reviewed and approved by the County beforehand. Each future development plan would be required to comply with the recommendations in the geotechnical investigation report and comply with the County Building Code, thereby reducing such hazards to a less than significant level.

Seismically Induced Landslides

The Project Area at buildout of the Proposed Project would increase numbers of residents, workers, visitors, and structures in Los Angeles County. The propensity for earthquake-induced landslides is greatest in areas characterized by steep slopes and/or bedrock or soil that are prone to mass movement. Only limited parts of the Project Area have been mapped by the State as zones of

seismically-induced landslide hazards under the Seismic Hazard Zonation Program. Nevertheless, the existing County's building plan check and development review process provides meaningful safeguards against exposure to such hazards.

Certain policies in the Land Use Element and Public Safety, Services, and Facilities Element of the Proposed Project are intended to address potential seismic-related hazards associated with ground shaking, liquefaction, and seismically induced landslides. These include Policies LU 3.1, LU 3.5, and PS 2.1 through PS 2.3.

Compliance with existing State and County regulations, as well as the goals and policies set forth in the Proposed Project would ensure that the impacts associated with exposure to strong seismic ground shaking, seismic-related ground failure including liquefaction, and landslides are reduced to a less than significant level.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.6-2: Plan implementation would result in substantial soil erosion, the loss of topsoil, or development atop unstable geologic units or soils, or expansive soils.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-20 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Erosion

Implementation of the Proposed Project would involve construction-related ground disturbance in various parts of the Project Area. During future development, soil would be graded or excavated and temporarily stockpiled. Construction-related grading during future development could result in significant erosion unless appropriate soil-erosion measures are implemented.

Most parts of the Project Area are typified by gentle to moderate topography and are less susceptible to erosion and/or the loss of topsoil. However, grading or ground disturbance in areas characterized by steep slopes may substantially increase the likelihood of erosion and/or topsoil loss. The grading process often removes protective vegetation, changes natural drainage patterns, and may produce oversteepened slopes. Policies concerning development in Hillside Management Areas (HMAs) also provide protection against erosion, particularly in areas dominated by steep slopes. In particular, the existing HMA Ordinance encourages development in HMAs on less steep slopes, and requires a Conditional Use Permit (CUP) prior to residential development in certain HMAs. Through the CUP, projects must protect the safety of current and future residents, and will not create significant threats to life and/or property due to the presence of geologic, seismic, slope instability, fire, flood, mud flow, or erosion hazard.

Adherence to the requirements of the County Building Code, together with the safeguards afforded by the County's building plan check and development review process, would help ensure that appropriate erosion controls are devised and implemented during construction. Furthermore, construction activities on individual development sites larger than one acre would be subject to National Pollution Discharge Elimination System (NPDES) requirements. Under the State-administered NPDES, the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) would be required as well as deployment of approved erosion control best

management practices (BMPs). Construction plans on sites one acre or larger are required to prepare and implement a SWPPP. The SWPPP is required to obtain coverage under the Statewide General Construction Activity permit issued by the State Water Resources Control Board. The SWPPP would specify BMPs that would be used during the construction phase of each affected construction plan to minimize water pollution, including pollution with sediment.

In addition to the requirement to prepare a SWPPP, grading during development is subject to erosion control measures in the County's Building Code, specifically the Grading Code Ordinance and Regulations. This code includes restrictions and practices that must be followed by developers in Los Angeles County. The faces of cut-and-fill slopes and development sites shall be prepared and maintained to control against erosion. Required erosion control measures may include temporary and/or permanent erosion control measures such as desilting basins, check dams, riprap, or other devices or methods, as approved by the County. Other types of development, such as utility-scale renewable energy projects, are reviewed for designs that minimize ground disturbance as well as grading. Consequently, impacts would be less than significant.

Unstable Geologic Units or Soils and Expansive Soils

Buildout of the Project Area under the Proposed Project would increase numbers of residents, workers, visitors, and structures in Los Angeles County. The Project Area is geographically expansive, embracing a variety of geologic settings and soil types. In most parts of the Project Area, unstable geologic units or soils, or expansive soils are not of concern. Nevertheless, areas of unstable geologic units or unstable or expansive soils are known to occur locally. Development subsequently considered for approval within the Project Area could expose structures or persons to potentially significant hazards due to unstable geologic units or soils.

Individual development plans would be required to adhere to existing building and grading codes. These codes contain provisions for soil preparation/conditioning to minimize hazards from unstable and expansive soils. Grading and building activities also requires the preparation of site-specific grading/building plans, soils and geology reports to address liquefaction, subsidence, hydrocollapse, and other potential geologic or soil stability issues. Such plans and reports must be tendered to the County for review and approval before development within the Project Area can commence. Submittal of these technical plans and studies would ensure that hazards arising from unstable and expansive soils would be minimized to the extent practicable.

Policies included in the Land Use Element, Conservation and Open Space Element, and Public Safety, Services, and Facilities Element of the Proposed Project have been developed to address potential hazards associated with soil erosion, topsoil loss, or development atop unstable geologic units or soils, or expansive soils. These include Policies LU 3.4, COS 5.5, COS 8.3, PS 2.2, and PS 2.4

Compliance with existing State and County regulations, as well as the goals and policies set forth in the Proposed Project, would ensure that the impacts associated with erosion and topsoil loss, as well as development atop unstable geologic units and soil, or expansive soil are reduced to the maximum extent practicable. Consequently, the overall, associated impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.6-2: Soil conditions would adequately support proposed septic tanks.

Support for this environmental impact conclusion is fully discussed starting on page 5.6-22 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Some of the development that is anticipated in the Project Area would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater would be discharged into the existing public sanitary sewer systems, where the wastes would be conveyed by pipes to plants for treatment at one of two nearby water reclamation plants operated by the Sanitation District of Los Angeles County. Elsewhere, in more rural parts of the Project Area, septic systems might be necessary, although the prevailing soil conditions are typically amenable to the use of such systems. In addition, all on-site wastewater treatment systems (OWTS) must comply with County Code Titles 11 and 28 and other regulations applicable to OWTS, including requirements for preparation and submittal of feasibility reports to obtain the County Department of Public Health - Environmental Health approval for construction and installation of OWTS. As such, there would be no impact from implementation of the Proposed Project at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems.

The impacts associated with the use of OWTS as a consequence of Proposed Project implementation would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Geology and Soils

Support for this environmental impact conclusion is fully discussed starting on page 5.6-23 of Section 5.6, *Geology and Soils*, of the DEIR.

Facts in Support of Finding:

Most of Southern California is situated in an area of a high seismic activity, including the Project Area. All cumulative development, both within the Project Area and within adjacent cities or parts of Los Angeles County, would be subject to the County Building Code, which contains requirements for development in areas subject to Seismic Design Categories E and F. Additionally, cumulative plans would be subject to the Alquist-Priolo Earthquake Fault Zone Act, which restricts development atop the traces of active faults. Due to the site-specific nature of geological conditions (i.e., soil type, bedrock type, topography and slope stability, occurrence of groundwater, etc.), potential impacts associated with geology and soils are typically assessed on a case-by-case basis, rather than on a cumulative basis. Nevertheless, cumulative growth due to plan implementation/buildout could expose a greater number of people to seismic hazards. Future cumulative development consistent with the Proposed Project and the surrounding area would be subject to the same local, State, and Federal regulations pertaining to geology and soils, including County Building Code requirements (or city building code requirements, as appropriate). Therefore, development in the region would not result in a significant cumulative impact. The Proposed Project, in combination with other plans, would not contribute to a potentially significant cumulative impact.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

6. Greenhouse Gas Emissions

Impact 5.7-2:	Implementation of the Proposed Project would not conflict with CARB's 2008 Scoping Plan, the CCAP, or SCAG's 2012 RTP/SCS.

Support for this environmental impact conclusion is fully discussed starting on page 5.7-26 of Section 5.7, *Greenhouse Gas Emissions*, of the DEIR.

Facts in Support of Finding:

The following plans have been adopted or are proposed and are applicable for development in the Project Area.

California Air Resources Board (CARB) Scoping Plan

In accordance with AB 32, CARB developed the Scoping Plan to outline the State's strategy to achieve 1990 level emissions by year 2020. To estimate the reductions necessary, CARB projected statewide 2020 business-as-usual (BAU) greenhouse gas (GHG) emissions and identified that the State as a whole would be required to reduce GHG emissions by 28.5 percent from year 2020 BAU to achieve the targets of AB 32 (CARB 2008). Since release of the 2008 Scoping Plan, CARB has updated the 2020 GHG BAU forecast to reflect GHG emissions in light of the economic downturn and measures not previously considered in the 2008 Scoping Plan baseline inventory. The revised BAU 2020 forecast shows that the State would have to reduce GHG emissions by 21.6 percent from BAU without Pavley regulations (regulations associated with California Assembly Bill 1493) and the 33 percent renewable portfolio standard (RPS) or 15.7 percent from the adjusted baseline (i.e., with Pavley and 33 percent RPS)) (CARB 2012c).

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS) and changes in the Corporate Average Fuel Economy (CAFE) standards (e.g., Pavley I and 2017–2025 CAFE standards), California Appliance Energy Efficiency regulations, California Building Standards (i.e., CALGreen and the 2013 Building and Energy Efficiency Standards), and 33 percent RPS. The GHG emissions in Table 5.7-7 of the DEIR include reductions associated with the Pavley fuel efficiency improvements (adopted in 2009) and these other statewide measures. Projects within the Project Area would be required to adhere to the following programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32.Therefore, growth under the Proposed Project would not conflict with the Scoping Plan and impacts would be less than significant.

CCAP

The County is in the process of drafting and adopting a Community Climate Action Plan (CCAP) along with the General Plan Update (Proposed General Plan). Although not yet adopted, the proposed CCAP identifies and evaluates feasible and effective policies to reduce GHG emissions to reduce energy costs, protect air quality, and improve the economy and the environment. The policies identified in the proposed CCAP represent the County's actions to achieve the GHG reduction targets of AB 32 for target year 2020 and would be applicable to future projects in the Project Area if

the proposed CCAP is adopted. A consistency analysis with the goals and actions of the Proposed Projectto the community actions in the proposed CCAP is shown in Table 5.7-7, *Consistency with the Unincorporated Los Angeles County Community Climate Action Plan*, of the DEIR.

As identified in the table above, the Proposed Project would include goals and policies that are overall consistent with the CCAP. Therefore, the Proposed Project would not conflict with the CCAP and impacts are considered less than significant.

SCAG's 2012 RTP/SCS

SCAG adopted its 2012 RTP/SCS on April 4, 2012, pursuant to the requirements of SB 375. SCAG's RTP/SCS is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light duty trucks in the Southern California region. The 2012 RTP/SCS also incorporates local land use projections and circulation networks in the cities' and counties' general plans. The projected regional development pattern—including the location of land uses and residential densities in local general plans—when integrated with the proposed regional transportation network in the 2012 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the subregional GHG reduction per capita targets for the SCAG region, which are an 8 percent per capita reduction from 2005 GHG emission levels by 2020 and a 13 percent per capita reduction from 2005 GHG emission levels by 2035.

The Proposed Project contains various goals and policies to reduce vehicle trips and vehicle miles traveled. Under the Proposed Project, overall growth would be directed towards rural town center areas and rural towns (see Policies LU 1.1, 5.1, 5.2, and 5.4). Development of a balanced mix of uses and services that would accommodate the local populace would be emphasized. In addition, the Proposed Project includes policies that focus on improving the pedestrian and biking networks (e.g., Policies M 9.1 through M 9.4 and M 11.1 through M 11.4) in addition to providing better and increased access to public transit options (e.g., Policies M 6.4, M 7.1, and M 7.3). Section 5.10, *Land Use and Planning*, includes a consistency analysis with SCAG's RTP/SCS (see Table 5.10-2, *Consistency with SCAG's 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy Goals*, of the DEIR). As identified in Table 5.10-2, the Proposed Project would be consistent with applicable RTP/SCS goals and impacts are considered less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

7. Hazards and Hazardous Materials

Impact 5.8-1:	Buildout in accordance with the Proposed Project would involve the routine transport, use, and/or disposal of hazardous materials.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-16 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would involve an increase in the transport, use, and disposal of hazardous materials. However, any future development and use of land uses, as designated under the Proposed Project, would be required to comply with applicable federal, state, and local regulations related to hazardous materials. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.8-2: Some areas within the Project Area are included on a list of hazardous materials sites.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-17 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

As depicted in Tables 5.8.1 and 5.8.2 of the DEIR, several sites within the Project Area are listed on hazardous materials databases complied pursuant to Government Code Section 65962.5. Some of the sites are listed as closed, indicating that they have been investigated and/or remediated to the satisfaction of the lead responsible agency based on land use at the time of closure. The Proposed Project would facilitate new development, including residential, mix-use, commercial, parks, and recreational open spaces, within the Project Area. Some of the new development could occur on properties that may be contaminated. Construction of new buildings during site grading and excavation operation and demolition of existing structures likewise could potentially result in the release of hazardous building materials (asbestos, lead paint, etc.) into the environment. Use of hazardous materials on newly developed properties after construction could potentially include cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the proposed uses.

Federal and state regulations exist that prevent or reduce hazards to the public and environment from existing hazardous materials sites. These include, but are not limited to, the following: 1) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), which regulates closed and abandoned hazardous waste sites; 2) Preliminary Remediation Goals, which establish tools for evaluating and cleaning up contaminated sites; 3) Cortese List, which provides information about the location of hazardous materials release sites; and 4) California Human Health Screening Levels, which evaluate sites with potential human health concerns.

Under implementation of the Proposed Project, land uses and development may be located on a site such as those pursuant to Government Code 65962.5, including burn dump sites, active, abandoned or closed landfills, areas with historic or current agriculture, or areas with petroleum contamination. However, compliance with applicable existing regulations and processes would ensure that the Proposed Project would not result in a significant hazard to the public or the environment from future development on existing hazardous materials sites. Therefore, the Proposed Project would have a less than significant impact associated with existing hazardous materials sites.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.8-3: Some areas within the Project Area are located in the vicinity of an airport or within the jurisdiction of an Airport Land Use Plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-18 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Buildout of the Project Area under the Proposed Project would involve new development and redevelopment on parcels within the plan areas of the comprehensive Los Angeles County Airport Land Use Plan (ALUP)—which includes Palmdale Regional Airport—and the Airport Land Use Compatibility Plan (ALUCP) for the General William J. Fox Airfield. However, on October 8, 2014, the Airport Land Use Commission determined that the Proposed Project is compatible with the relevant ALUP and ALUCP in the Project Area. Also, future development under the Proposed Project would be required to be consistent with any applicable ALUP or ALUCP as stated in Policy LU 3.7. Furthermore, compliance with policies included in the Land Use Element and Public Safety, Services and Facilities Element of the Proposed Area Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. In particular, Policy ED 1.2 requires that new land uses near Palmdale Regional Airport be compatible with the airport and not "restrict or prohibit future expansion of the airport." Policy LU 3.6 limits new residential uses in airport influence areas and near military land.

The County's ALUCP provides guidance related to the placement of land uses near airports. These recommendations are based on a variety of factors, including those related to noise, safety, and aircraft movement. In addition to the identification of land use compatibility issues, the ALUCP identifies notification disclosure areas around each airport. These ALUCPs are largely based on requirements provided by the California Airport Land Use Planning Handbook, which was developed using Federal Aviation Administration (FAA) regulations that establish compatible land use and density criteria from recorded crash patterns.

Some land uses designated under the Proposed Project would be more likely to result in public airport safety hazards than others. For example, areas designated as residential and commercial would be likely to continually contain high concentrations of people. If such land uses are in areas adjacent to public airport operations, public airport hazards would be considered potentially significant. In contrast, open space recreation or open space conservation land use designations would generally not accommodate high density populations. Therefore, impacts from public airport hazards in areas with open space land use designations would generally not occur.

Federal and state regulations exist that prevent hazards to the public and environment near public airports. These include FAA regulations, which establish safety standards for civil aviation, and the State Aeronautics Act, which establishes air safety standards. In addition, the County requires that development projects near public airports comply with any applicable ALUP or ALUCP.

Implementation of the Proposed Project may result in land use designations that allow development within two miles of a public airport, private airstrip, or heliport. However, existing FAA regulations, County policies and regulations, and Proposed Project goals and policies are intended to identify and properly address potential airport hazards prior to implementation of specific projects within the Project Area. Therefore, potential impacts associated with public airports, private airstrips, and heliports are less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.8-4: The Proposed Project could affect the implementation of an emergency response or evacuation plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-19 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Continued growth and development associated with implementation of the Proposed Project has the potential to strain the emergency response and recovery capabilities of federal, state, and local governments. Coordination among various County departments is necessary to ensure adequate emergency response.

Continued growth and development in Project Area will significantly affect the Los Angeles County Fire Department (LACoFD) and Los Angeles County Sheriff's Department (LASD) operations. Coordination among various County departments is necessary to ensure adequate emergency response. Collaboration can also ensure that development occurs at a rate that keeps pace with service needs. In addition, proposed policies of the Proposed Project have been developed to address this potential hazard, including Policies PS 6.1 through PS 6.6

Compliance with applicable regulations and implementation of the Proposed Project goals and policies would ensure the risk of impaired implementation or physical interference with an adopted emergency response plan or emergency evacuation plan is less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.8-5: Portions of the Project Area are within moderate, high, and very high fire hazard zones and could expose structures and/or residences to fire danger.

Support for this environmental impact conclusion is fully discussed starting on page 5.8-20 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

Los Angeles County faces major wildland fire threats due to its hilly terrain, dry weather conditions, and the nature of its plant coverage. The at-risk areas are designated as Fire Hazard Severity Zones (FHSZs) per Government Code Sections 51175–51189. FHSZs in the Project Area are classified as Very High, High, and Moderate in State Responsibility Areas and Very High in Local and Federal Responsibility Areas. The Forestry Division of the LACoFD designates the Very High FHSZs (VHFHSZs) in the local responsibility areas.

In an effort to reduce the threats to lives and property, the LACoFD has instituted a variety of regulatory programs and standards for vegetation management, pre-fire management and planning, fuel modification, and brush clearance. In addition to these programs, the LACoFD and the County Department of Public Works (LACDPW) enforce fire and building codes related to development in VHFHSZs. The LACoFD has access requirements for single family residential uses built in VHFHSZs. Access requirements for all other uses built within VHFHSZs are determined on a case-by-case basis.

The State Board of Forestry and the California Department of Forestry and Fire Protection (CAL FIRE) have drafted a comprehensive document for wildland fire protection in California. The Fire Plan Unit of LACoFD is in charge of implementing the California Fire Plan in Los Angeles County. The Strategic Fire Plan prepared by LACoFD identifies and prioritizes pre- and post-fire management strategies and tactics to reduce loss of life, property, and natural resources. The plan is updated annually.

Fuel modification plans are required for projects within areas designated as FHSZs within the State Responsibility Areas (SRA) or VHFHSZs within the Local Responsibility Areas (LRAs), as described in Title 32, Fire Code, Section 4908 of the County Code. The fuel modification plan identifies specific zones within a property that is subject to fuel modification. Vegetation management, as it relates to wildland fire, refers to the total or partial removal of high-fire-hazard grasses, shrubs, or trees. This includes thinning to reduce the amount of fuel and modification of vegetation arrangement and distribution to disrupt fire progress. The Vegetation Management Program (VMP) is a cost-sharing program that focuses on the use of prescribed fire, hand crews, mechanical, biological and chemical means, for addressing wildland fire fuel hazards, habitat restoration, and other resource management issues on SRA and LRA lands.

Although fires are a natural part of the wildland ecosystem, development in wildland areas increases the danger of wildfires to residents, property, and the environment. Although multiple regulations are in place to ensure that adequate infrastructure, such as peak load water supplies and necessary disaster routes are incorporated into new developments, older communities with aging and substandard infrastructure may face greater risks from wildland fires. In addition, current regulations cannot ensure that all developments that locate in VHFHSZs are protected from wildland fire threats.

The Proposed Project policiesthe Land Use Policy Map that limits development in high fire prone areas, and conditions of approval for future development projects within the Project Area, in addition to compliance with applicable regulations, will minimize Proposed Project impacts related to wildland fires. Consequently, the overall associated impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Hazards and Hazardous Materials

Support for this environmental impact conclusion is fully discussed starting on page 5.8-22 of Section 5.8, *Hazards and Hazardous Materials*, of the DEIR.

Facts in Support of Finding:

In general, cumulative impacts related to hazards and hazardous materials are more prevalent for commercial or industrial land uses. Hazardous material use or hazardous emissions would be cumulatively significant when the combined activities of individual industrial or commercial businesses that use, transport, or dispose of hazardous materials result in hazardous conditions. Cumulative impacts may also occur when multiple development projects disrupt existing hazardous materials sites in adjacent areas. Additionally, the transportation of hazardous materials may increase as a direct result of increased hazardous materials usage within Los Angeles County. Continued growth and development in the Project Area will significantly affect the LACoFD and LASD operations. Any future development would be required to comply with applicable federal, state and local regulations related to hazardous materials, emergency response, wildland fires, and public

airports, private airstrips, and heliports. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials, would be less than significant. Required compliance with these regulations would ensure impacts related to transport, use and disposal of hazardous materials, emergency response, wildland fires, and airports would be less than significant. Therefore, impacts related to hazards and hazardous materials would not be cumulatively considerable.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

8. Hydrology and Water Quality

Impact 5.9-1:	Implementation of the Proposed Project would comply with water quality standards and waste discharge requirements and would not substantially degrade water quality.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-24 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Proposed Project buildout would involve soil disturbance, construction, and operation of developed land uses that could each generate pollutants affecting stormwater. Proposed Project buildout would result in approximately 81,441 additional housing units compared to existing conditions. These new units would generate about 311,290 additional residents. Buildout of the Proposed Project would also result in a 39 percent increase in non-residential (commercial and industrial) space with an additional 37.1 million square feet. New land uses would result in an increase of approximately 102,513 more jobs than under existing conditions.

Discharges from Construction Sites to Stormwater

Buildout of the Project Area could result in changes to the amount of storm water runoff and water quality during construction activities. Storm water runoff could contain pollutants such as soil and sediments that are released during grading and excavation activities and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. Other common pollutants that can result from construction activities include solid or liquid chemical spills; concrete and related cutting or curing residues; wastes from paints, stains, sealants, solvents, detergents, flues, acids, lime, plaster, and cleaning agents; and heavy metals from equipment. The storm water runoff flows through streets, drainage ditches, washes, and creeks within the Project Area and eventually discharges into Rosamond, Buckhorn, or Rogers Dry Lakes. Although there is no direct discharge to impaired water bodies within the Project Area, some of these water bodies could be impacted from the indirect discharge of pollutants in storm water.

However, all projects within the Project Area that involve construction activities disturbing one or more acres of land would be required to obtain an NPDES permit from the SWRCB. Coverage under the permit requires the submittal of Permit Registration Documents (PRDs), risk assessment, site map, SWPPP, annual fee, and signed certification statement. The PRDs are submitted electronically to the SWRCB via the Storm Water Multiple Application and Report Tracking System (SMARTS) website. The SWPPP includes BMPs to reduce water quality impacts, including various measures to control on-site erosion; reduce sediment flows into storm water; to control wind erosion; reduce tracking of soil and debris into adjacent roadways and off-site areas; and manage

wastes, materials, wastewater, liquids, hazardous materials, stockpiles, equipment, and other site conditions to prevent pollutants from entering the storm drain system. Inspections, reporting, and storm water sampling and analysis are also required to ensure that visible and non-visible pollutants are not discharged off-site. Categories of BMPs used in SWPPPs are described in Table 5.9-3 of the DEIR.

In addition, the County has requirements for erosion and sediment control for grading operations, as set forth in the Grading Code Ordinance and Regulations of the County Code. All construction sites are required to implement BMPs to control erosion, debris, and construction-related pollutants. All active grading projects with grading activities proposed during the rainy season (October 15 to April 15) are required to submit an Erosion and Sediment Control Plan (ESCP) to the LACDPW prior to the issuance of grading permits. All non-residential sites, residential sites of 6 stories or greater, and projects with a disturbed (graded) area of one acre or greater are also required to prepare and submit an ESCP. The ESCP must include appropriate BMPs for general site management, construction materials and waste management, and erosion and sediment controls. These BMPs must be provided for both the wet and dry seasons, and the ESCP must be revised every year and approved prior to the start of the rainy season.

Implementation of the provisions of the NPDES permit and compliance with County grading requirements would minimize construction impacts from future development within the Project Area by implementing BMPs that reduce construction-related pollutants. This would ensure that any impacts to downstream receiving water bodies resulting from construction activities within the Project Area allowed by the Proposed Project would be less than significant. Full compliance with applicable local, State, and federal regulations would reduce water quality impacts associated with construction to a less than significant level.

Discharges from Developed Land Uses (Post-construction) to Stormwater

Potential pollutants that could be generated by maximum build out of the Project Area include bacteria/viruses, heavy metals, nutrients, pesticides, organic compounds, sediment, trash and debris, oxygen-demanding substances, and oil and grease. Specific pollutants would depend on the type of land use and site improvements proposed by individual projects.

All applicants for future development within the Project Area would be required to comply with the County Code, Title 12, Chapter 12.84, Low Impact Development (LID) Standards, and the NPDES Municipal Separate Storm Sewer Systems (MS4) permit. The LID Standards Manual provides guidance for implementing stormwater quality control measures in new development and redevelopment projects with the intent of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. Each applicant for new development or significant redevelopment within the Project Area must submit an LID Plan for review and approval by LACDPW that provides a comprehensive, technical discussion of how the proposed project will comply with the requirements of the County Code and LID Standards Manual.

The LID Plan would identify permanent site design, source-control, and treatment-control BMPs that would be implemented as part of the project, including pollutant removal and protection of downstream water resources. Preparation and implementation of LID Plans for new development and redevelopment projects would satisfy MS4 permit requirements and would ensure that the project complies with water quality standards for storm water runoff.

Implementation of these programs and regulatory requirements would reduce storm water pollutants that could affect water quality within the Project Area, thus reducing impacts related to storm water pollution and water quality to less than significant levels.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-2: Future development pursuant to the Proposed Project could interfere with groundwater recharge.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-26 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Future development within the Project Area would result in an increase in impervious surfaces by adding 81,441 housing units and 37.1 million square feet of commercial/industrial space. Increases in impervious surfaces would reduce infiltration, which could lead to reduced groundwater recharge. However, applicants for new development or significant redevelopment would be required to submit LID Plans to the LACDPW prior to the issuance of grading and building permits, with the goal of matching undeveloped runoff conditions of the site with post-development conditions. The treatment control BMPs would also include, to the extent feasible, infiltration features that will contribute to groundwater recharge and minimize storm water runoff. Please refer to Section 5.17.2, Water Supply and Distribution Systems, for additional information on future water supply and demand.

While impervious areas would be added in the Project Area by development allowed under the Proposed Project, the increase in impervious areas would still be a small fraction of the Project Area. About 97.6 percent of the Project Area is designated for either Open Space or Rural Land uses; the maximum permitted density in the Rural Land designation is one residential unit per acre. Therefore, buildout of the Project Area would not substantially interfere with groundwater recharge due to an increase in impervious areas.

Groundwater typically occurs at depths of at least 50 to 100 feet below ground surface Therefore, it is not expected that construction activities associated with building within the Project Area allowed by the Proposed Project would encounter groundwater and require dewatering.

Groundwater continues to be an important resource for water supply in the Project Area. Prior to 1972, groundwater provided more than 90 percent of the total water supply. Since 1972, it provides 50 percent to 90 percent of the total water supplied to the Project Area. In terms of groundwater recharge, only about 5 percent of the precipitation that falls in the Antelope Valley each year percolates to the groundwater basin, while the remaining water is lost to evaporation. There is an overdraft of groundwater in this region in the past, resulting in subsidence and earth fissures in the Lancaster and Edwards Air Force Base areas.

The 2013 Antelope Valley Integrated Regional Water Management Plan (AVIRWMP) forecasts that groundwater resources combined with existing and new imported SWP water, surface water, and recycled water supplies will be sufficient to meet the population needs of the Antelope Valley through the year 2035, assuming a population increase to 547,000 by 2035. Most of the implementation projects to address water supply issues in the AVIRWMP come directly from local planning documents. Altogether, the projects included in the AVIRWMP directly implement elements of a number of local plans and studies, including Urban Water Management Plans (UWMPs), Water Recycling Master Plans, Water Conservation Master Plans, and Master Facilities Plans.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-3:	Buildout of the Proposed Project would not substantially alter drainage patterns and would not result in substantial erosion or siltation.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-27 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Buildout of the Project Area has the potential to result in an increase in impervious surfaces by adding 81,441 housing units and 37.1 million square feet of commercial/industrial space, thus creating an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause erosion or sedimentation in drainage swales and streams. Increased runoff volumes and velocities could create nuisance flooding in areas without adequate drainage facilities.

Under the Los Angeles County MS4 Permit, certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects in the Project Area for which LID Plans are required must limit post-development peak stormwater runoff rates to predevelopment rates for developments where the increased peak stormwater runoff rates will result in an increased potential for downstream erosion. While impervious areas would be added with implementation of the Proposed Area Plan, the increase in impervious area would still be a small fraction of the total land area. Approximately 97.6 percent of the Project Area is designated for either Open Space or Rural Land uses, with a maximum density of one residential unit per acre.

Construction projects with disturbed areas of one acre or more must implement BMPs for erosion and sediment control pursuant to the General Construction Permit, as discussed under Impact 5.9-1. Also, the majority of grading projects in the unincorporated area of Los Angeles County would require submittal of an ESCP to the LACDPW prior to the issuance of grading permits. This will further reduce the potential for erosion or siltation to occur with construction at the new development sites.

Projects developed under the Proposed Project would comply with existing regulations for avoiding or minimizing erosion and sedimentation, and impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-4:	Development pursuant to the Proposed Project would not substantially change drainage patterns in Los Angeles County. While such development could increase rates or volumes of surface runoff, the changes would not result in substantial increases that would result in on-site or off-site flooding.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-28 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would not significantly change existing drainage patterns within the Project Area. Under the MS4 Permit, certain categories of development and redevelopment projects are required to mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects subject to LID requirements are required to limit post-development peak stormwater runoff rates to no greater than the pre-development rates for developments where the increased peak stormwater rate will result in increased potential for downstream erosion.

Flooding in the Antelope Valley is caused largely by runoff from the San Gabriel and Sierra Pelona Mountains to the south, with heavy discharges prevalent along Big Rock Creek, Little Rock Creek, and Anaverde Creek. Proposed zoning in the areas susceptible to flooding will be primarily open land, agricultural land, or rural residential, which should not result in a substantial increase in surface runoff or contribute to additional flooding due to the limited increase in impervious surfaces. In summary, development consistent with the Proposed Project would not substantially increase runoff rates or volumes or contribute to increases in flooding. Therefore, impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-5: Implementation of the Proposed Project could place structures within 100-year flood hazard areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-29 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Proposed Area Plan land-use designations within 100-year flood zones are shown in Table 5.9-4, *Land-Use Designations in 100-Year Flood Zones, Antelope Valley Area Plan,* of the DEIR. Approximately 73,927 acres out of 1,130,544 acres, or about 6.5 percent of land within the Project Area are located within a 100–year flood zone. About 5,879 acres, or 8 percent of areas in the 100-year flood zones, are designated as open space. The remainder of the 100-year flood zones is designated for development, mostly lower density residential development.

Although portions of the Project Area within the current 100-year floodplain are proposed for development, the County has an ongoing Floodplain Management program, which includes mapping of flood hazard areas, adopting new and/or updated ordinances, and regulating and enforcing safe building practices. Future development within 100-year flood zones would require submittal of a Letter of Map Revision (LOMR) application to Federal Emergency Management Act (FEMA) for review and approval. LOMR application submittals also must be coordinated with the LACDPW. All new development would be required to meet federal floodplain regulations, including that the lowest floor of the structure be raised above the 100-year base flood elevation. Flood insurance available through the National Flood Insurance Program would also be required.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-6: Parts of the Project Area are within inundation areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-29 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

According to California Office of Emergency Services (OES) dam inundation maps, portions of the Project Area are within the dam inundation zones of Bouquet Reservoir, Fairmont Reservoir, Palmdale Lake, and Little Rock Reservoir. However, most of the dam inundation zones are not in areas planned for development, and most of the dams impound relatively small amounts of water, as shown below:

- Palmdale Lake – 3,870 acre-feet
- Little Rock Reservoir –4,600 acre-feet
- Fairmont Reservoir – 7,507 acre-feet
- Bouquet Reservoir – 36,505 acre-feet

There is only a small area of the dam inundation area for Bouquet Reservoir that is within the Project Area and this portion of the Project Area is zoned as watershed, with no plans for development. The dam inundation zone for Fairmont Reservoir passes through land zoned for open space and agricultural use before reaching the City of Lancaster. The Palmdale Lake dam inundation zone passes through open space designated as the San Andreas Rift Zone SEA and then is contained within the city limits of Palmdale before terminating at Palmdale Boulevard. For the dam inundation area between the City of Lancaster and Rosamond Lake, the proposed zoning is agricultural and manufacturing. Therefore, implementation of the Proposed Project would allow for some structures within existing dam inundation areas.

The Littlerock Reservoir dam inundation zone first passes through an area zoned as watershed and the Antelope Valley SEA before turning east and then north passing through land zoned agricultural. It passes through the west side of the Littlerock community, a portion of which has a proposed zoning designation of A-2 and could include new housing as part of the Proposed Project, before entering the city limits of Palmdale where it terminates.

The probability of dam failure is extremely low and the Project Area has never been impacted by a major dam failure. Dams in California are continually monitored and inspected by various governmental agencies, including the California Division of Safety of Dams. Dam owners are required to maintain Emergency Action Plans (EAPs) that include procedures for damage assessment and emergency warnings. Furthermore, the County addresses the possibility of dam failure in the Safety Element of the Adopted General Plan and Hazard Mitigation Plan.

Due to the small amount of water behind the dams in the Project Area and the limited amount of new housing that will occur in dam inundation areas, implementation of the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure, and impacts are considered to be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.9-7: Parts of the Project Area are subject to inundation by seiche or mudflow.

Support for this environmental impact conclusion is fully discussed starting on page 5.9-30 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

Hazards from dam inundation resulting from seiches are addressed above in Impact 5.9-6. Released water from a seiche would result in much smaller footprints than the dam inundation zones and the probability of this occurring is extremely low.

There are few above ground storage tanks in the Project Area, since most of the residents rely on groundwater wells and imported surface water. In addition, the County requires risk assessments of flooding from failure of aboveground water storage tanks for projects down gradient from these storage tanks. Where such assessments determined that a proposed building would be affected by such flooding, either the building pad for the proposed development would be required to be raised above the flood elevation determined by the risk assessment; or improvements shall be made to the water tank to reduce the probability and/or consequence of tank failure, in the case where the owner and/or manager of an aboveground storage tank is willing to allow such improvements. Therefore, impacts from seiches related to dams or aboveground storage tanks would be less than significant.

Canyons in the northern slopes of the Sierra Pelona Mountains and San Gabriel Mountains and alluvial fans at the foot of the San Gabriel Mountains are susceptible to mudflows, as shown on the US Geological Survey Special Hazard Maps. However, according to the proposed zoning maps for the Project Area, the areas that are susceptible to mudflows are on steep slopes and are zoned as watershed. These areas are not planned for future development, and therefore implementation of the Proposed Project would not place substantial numbers of people at risk from mudflows.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Hydrology and Water Quality

Support for this environmental impact conclusion is fully discussed starting on page 5.9-31 of Section 5.9, *Hydrology and Water Quality*, of the DEIR.

Facts in Support of Finding:

The cumulative study area with regard to hydrology and water quality includes the watersheds that encompass the Project Area (i.e., Antelope Valley Watershed, Santa Clara River Watershed, San Gabriel River Watershed, and Los Angeles River Watershed). Future development within the Project Area, in conjunction with existing and planned development in these watersheds, could result in a cumulatively considerable impact to water quality due to construction activities and increases in post-development runoff.

All construction projects that involve the disturbance of one or more acres of land are subject to the NPDES Construction Permit requirements for implementation of individual SWPPPs, which outline erosion control, sediment control, wind erosion control, tracking control, non-storm water management and waste management, and materials pollution control BMPs. Additionally, new development and significant redevelopment projects within Los Angeles County are required to prepare and implement LID Plans for implementation of source-control, site design, and treatment-

control BMPs to ensure compliance with water quality goals and compliance with the MS4 Permit. Thus, pollutants generated within the Project Area and cumulative projects in the watersheds would be mitigated during construction activities and project operation. Compliance with the RWQCB's requirements for waste discharge requirements and/or water quality certifications for certain types of project would also prevent long-term water quality impacts.

Compliance with local, State, and federal regulations to minimize storm water runoff from individual projects in conjunction with the Los Angeles County Flood Control District's (LACFCD's) drainage fee program for new development projects within its jurisdiction would reduce impacts from flooding, and significant cumulative impacts would not occur. In addition, housing placed within 100-year floodplains would be subject to federal regulation and approval by the LACDPW, with the lowest floor of the structure elevated above the base flood elevation.

As cumulative projects would be required to comply with the above-listed water-quality, drainage, and flood-safety requirements, significant cumulative impacts would not occur. Therefore, the Proposed Project would not contribute to significant cumulative hydrology and water-quality impacts.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

9. Land Use and Planning

Impact 5.10-1:	Implementation of the Proposed Project would not include construction of roads or other improvements that could divide an established community.

Support for this environmental impact conclusion is fully discussed starting on page 5.10-19 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

New land uses allowed under the Proposed Project would generally follow existing land use patterns and are not anticipated to divide existing communities. Although the Proposed Project discusses expansion of the existing street, highway, and transit networks in the Project Area, the project does not involve approval of any specific transportation projects. Impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.10-2:	Implementation of the Proposed Project would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.

Support for this environmental impact conclusion is fully discussed starting on page 5.10-20 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

The following is an analysis of the Proposed Project's consistency with applicable state and regional laws, regulations, plans, and guidelines.

Although the Proposed Project is not a General Plan, the Proposed Area Plan has been prepared in accordance with state planning law, as provided in California Government Code Section 65300. The Area Plan is meant to be a framework for guiding planning and development in the Project Area through 2035 and beyond and can be thought of as the blueprint for Project Area's growth and development. The proposed Land Use Policy Maps (see Figure 3-4(a–c) of the DEIR) and goals and policies in the updated elements strive to preserve and ensure land use compatibility throughout the Project Area. The proposed Mobility Element also contains policies that would help the County implement AB 1358. In particular, Policies M 11.1, M 11.2, and M 11.5 require that the circulation network in "rural town centers" be designed to accommodate pedestrians, bicyclists, and equestrians.

Each of the specific and applicable requirements in the state planning law (California Government Code Section 65300) have been examined and considered to determine if there are environmental issues within the community that the General Plan should address, such as fire hazards and flooding. The various environmental issues associated with the Proposed Project (e.g., air quality, hazards, flooding, traffic, etc.) are addressed in their respective topical sections in Chapter 5, *Environmental Analysis*, of this DEIR.

Table 5.10-2 in the DEIR provides an assessment of the Proposed Project's relationship to pertinent 2012–2035 SCAG RTP/SCS goals. Proposed Area Plan policies identified in the table are listed in Subsection 5.10-4 of this section.

The analysis in Table 5.10-2 of the DEIR concludes that the Proposed Project would be consistent with the applicable RTP/SCS goals. Therefore, implementation of the Proposed Project would not result in significant land use impacts related to the RTP/SCS.

Buildout of the Project Area under the Proposed Project would involve new development and redevelopment on parcels within the plan areas of the comprehensive Los Angeles County ALUP—which includes Palmdale Regional Airport—and the ALUCP for the General William J. Fox Airfield. Future development under the Proposed Project would be required to be consistent with any applicable ALUP or ALUCP. Furthermore, compliance with policies included in the Land Use Element and Public Safety, Services and Facilities Element of the Proposed Area Plan related to land use compatibility would ensure that development would not conflict with airport land use plans. In particular, Policy ED 1.2 requires that new land uses near Palmdale Regional Airport be compatible with the airport and not "restrict or prohibit future expansion of the airport." Policy LU 3.6 limits new residential uses in airport influence areas and near military land. Policy LU 3.7 further requires that all development projects located on parcels that are within an airport influence area shall be consistent with all policies of that airport's land use compatibility plan.

As demonstrated in Table 5.10-2 of the DEIR and the other subsections above, the Proposed Project would not conflict with goals contained within SCAG's 2012–2035 RTP/SCS or other land use plans. Therefore, impacts related to compatibility between the Proposed Project and applicable plans adopted for the purpose of avoiding or mitigating environmental effects would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.10-3: The Proposed Project would not conflict with the West Mojave Plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.10-26 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

The West Mojave Plan HCP (WMP) applies to portions of the Project Area. A second HCP, the Desert Renewable Energy Conservation Plan (DRECP), is under development, but not yet adopted. Consistency between these two plans and the Proposed Project is discussed below.

The plan areas for the Draft Desert Renewable Energy Conservation Plan NCCP/HCP and the West Mojave Plan HCP cover the northern two-thirds of the Project Area. This region is north of the San Gabriel Mountains and contains the Antelope Valley and its eastward transition into the Mojave Desert. Within Los Angeles County, the plans areas for the two conservation plans are coterminous.

Once approved, the Draft Desert Renewable Energy Conservation Plan NCCP/HCP would provide renewable energy project developers with binding, long-term endangered species permit assurances while facilitating the review and approval of solar thermal, utility-scale solar photovoltaic, wind, and other forms of renewable energy and associated infrastructure. Because the Draft Desert Renewable Energy Conservation Plan NCCP/HCP is not yet approved, implementation of the Proposed Project would not conflict with the Proposed Area Plan. Furthermore, the Proposed Area Plan establishes that site-specific renewable energy systems are highly preferred over new utility-scaled energy projects (see Policy COS 12.1). Lastly, approval of the Proposed Project does not include approval of specific energy projects in the plan area of the Draft DRECP NCCP/HCP.

The intent of the West Mojave Plan is to conserve habitat for special-status species in the Mojave Desert while creating a streamlined permit process that minimizes the need for individual consultations with the U.S. Fish and Wildlife Service and the CDFW. Although buildout of the Proposed Project would result in substantial growth and development in the West Mojave Plan HCP area, individual development projects in the Antelope Valley would be required to comply with provisions of the West Mojave Plan HCP and other local, state, and federal regulations. Furthermore, conservation areas identified in the West Mojave Plan are located in Rural Preserve Areas in the proposed Land Use Policy Map and covered by policies related to the County's Rural Preservation Strategy, which would limit development in these areas. Therefore, the Proposed Project does not conflict with the West Mojave Plan HCP.

Conclusion

As demonstrated above, the Proposed Project would not conflict with adopted habitat conservation plans. Although buildout of the Project Area allowed by the Proposed Project would include development and redevelopment in areas covered by conservations plans, such development would be required to comply with provisions of those plans. Therefore, impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Land Use and Planning

Support for this environmental impact conclusion is fully discussed starting on page 5.10-27 of Section 5.10, *Land Use and Planning*, of the DEIR.

Facts in Support of Finding:

Cumulative projects in the region would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Similar to the Proposed Project, cumulative projects in the region would utilize regional planning documents such as SCAG's RTP/SCS during planning, and the general plans of cities would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in these jurisdictions would be required to comply with the applicable land use plan or they would not be approved without an amendment to that jurisdiction's general plan.

As discussed above, implementation of the Proposed Project would not conflict with existing land use plans, policies, or regulations of agencies with jurisdiction over the Project Area. Therefore, the Proposed Project would not contribute to a significant cumulative impact.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

10. Mineral Resources

Impact 5.11-3: Buildout of the Proposed Project would not cause a loss of availability of oil and natural gas reserves in the Project Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-19 of Section 5.11, *Mineral Resources*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would not result in development of land that is used for, or has the potential to be used for, extraction of fossil fuels such as oil and natural gas. As stated above, while oil and natural gas fields lie beneath large swaths of Los Angeles County, there are no oil or gas fields located in the Project Area. No impact would occur.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

11. Noise

Impact 5.12-1: Construction activities would result in temporary noise increase in the vicinity of the Proposed Project.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-41 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would result in construction of new residential, commercial, and industrial uses throughout the Proposed Area Plan. Two types of temporary noise impacts could occur during construction. First, the transport of workers and movement of materials to and from

the individual work sites could incrementally increase noise levels along local access roads. The second type of temporary noise impact is related to demolition, site preparation, grading, and/or physical construction. Construction is performed in distinct steps, each of which has its own mix of equipment, and, consequently, its own noise characteristics. Table 5.12-15 in the DEIR lists typical construction equipment noise levels recommended for noise-impact assessments, based on a reference distance of 50 feet between the equipment and noise receptor.

As shown in the table, construction equipment generates high-levels of noise with maximums ranging from 71 A-weighted decibels (dBA) to 101 dBA. Construction of individual developments associated with the buildout of the Proposed Project would temporarily increase the ambient noise environment and would have the potential to affect noise-sensitive land uses in the vicinity of an individual project. County Code Section 12.08.440 allows for construction activities during the specified hours of 7:00 AM to 7:00 PM on weekdays (including Saturdays), but restricts such activities on Sundays or holidays. Furthermore, this code section restricts noise levels by both equipment type (i.e., mobile or stationary) and receptor land use classification type. However, construction activities may occur outside of these hours if the County determines that the emergency maintenance, repair, or improvement of public service utilities is needed or if a variance is issued by the health officer. Construction work can also occur outside these hours if there is no disturbance but must comply with established noise levels and approval by County staff.

Significant noise impacts may occur from operation of heavy earthmoving equipment and truck haul that would occur with construction of individual development projects. Implementation of the Proposed Project anticipates an increase in development intensity. Construction noise levels are dependent upon the specific locations, site plans, and construction details of individual projects, which have not yet been developed. Construction would be localized and would occur intermittently for varying periods of time. Because specific project-level information is not available at this time, it is not possible to quantify the construction noise impacts at specific sensitive receptors. Construction of individual developments associated with implementation of the Proposed Project would temporarily increase the ambient noise environment in the vicinity of each individual project. However, compliance with the Section 12.08.440 Construction Noise, of the County Code will reduce any potential construction noise impacts to a less than significant level.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.12-4: The Proposed Project could create elevated levels of groundborne vibration and groundborne noise; both in the short-term (construction) and the long-term (operations).

Support for this environmental impact conclusion is fully discussed starting on page 5.12-56 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Caltrans has studied the effects of propagation of vehicle vibration on sensitive land uses and notes that "heavy trucks, and quite frequently buses, generate the highest earthborn vibrations of normal traffic." Caltrans further notes that the highest traffic-generated vibrations are along freeways and state routes. Their study finds that "vibrations measured on freeway shoulders (five meters from the centerline of the nearest lane) have never exceeded 0.08 inches per second, with the worst combinations of heavy trucks. This level coincides with the maximum recommended safe level for ruins and ancient monuments (and historic buildings)." Typically, trucks do not generate high levels

of vibration because they travel on rubber wheels and do not have vertical movement, which generates ground vibration. Thus, transportation routes within Antelope Valley—including freeways, highways, major and minor arterials, and most other heavily traveled local roadways—are not expected to generate excessive vibration.

Vibration levels in Antelope Valley from trains are dependent on site-specific conditions such as geology and the condition of the railroad track and train wheels. Although it is not proposed at this time, if modifications of existing rail tracks are planned, vibration would be addressed in the environmental review for each individual rail improvement project.

As groundborne vibration is associated with any given train pass-by, but then subsides once the train has passed, any increases in number of train movements would only create additional occurrences of pass-by vibration, but not increased amplitudes of vibration levels. Thus, any potential increase in rail traffic would not increase the maximum vibration levels at nearby uses and such potential increases in the frequency of daily rail trips would not result in the generation of excessive vibration.

Implementation of the Proposed Project may add new sensitive uses in areas adjacent to existing and future railroad lines. These developments may result in placing residential or other sensitive uses near the railroad lines which could result in excessive groundborne vibration from train operations. The extent of the exposure to vibration depends on site-specific conditions, location of buildings, and size and design of the proposed buildings. Further specific, project-level review would be required as future developments are proposed.

The use of heavy equipment associated with industrial operations can create elevated vibration levels in its immediate proximity. Soil conditions have a strong influence on the levels of groundborne vibration and, as a result, vibration typically dissipates rapidly with distance away from the source. Further specific, project-level review would be required as future developments are proposed.

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures, but can achieve the audible and perceptible ranges in buildings close to the construction site. Table 5.12-19 in the DEIR lists vibration levels for construction equipment.

As shown in Table 5.12-19 of the DEIR, vibration generated by construction equipment has the potential to be substantial because it has the potential to exceed the FTA Criteria for human annoyance of 78VdB (VdB is an abbreviation for vibration decibels, and is references as $1x10^{-6}$ inches per second) and structural damage of 0.200 in/sec. However, groundborne vibration is almost never annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers (FTA 2006). Vibration impacts may occur from construction equipment associated with development in accordance with the Proposed Project. However, compliance with the Section 12.08.560 Vibration of the County Code will reduce any potential vibration impacts to a less than significant level.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.12-5: The proximity of future Antelope Valley development to an airport or airstrip would not result in exposure of future resident and/or workers to airport-related noise.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-58 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would involve new development and redevelopment on parcels within the plan areas of adopted Airport Land Use Plans (ALUPs) and Airport Land Use Compatibility Plans (ALUCPs), including the comprehensive Los Angeles County ALUP and the ALUCP for the General William J. Fox Airfield. As discussed previously, the airport 65 dBA Community Noise Equivalent Level (CNEL) noise level contours for the General William J. Fox Airfield are contained within the City of Lancaster and do not reach the Plan Area. The 65 dBA CNEL noise level contours for the Palmdale Regional Airport do extend to areas proposed to be zoned as agricultural and manufacturing. These are not considered noise-sensitive uses. Future development allowed under the Proposed Project would be required to be consistent with any applicable ALUP or ALUCP constraints pertaining to nearby developments. Furthermore, compliance with policies included in the Adopted General Plan Noise Element would ensure that development would not conflict with airport land use plans. Therefore, as the Area Plan anticipates development of uses that are not noise-sensitive, and with any future review by the Los Angeles County Airport Land Use Commission as applicable, future development allowed under the Proposed Project would be consistent with adopted ALUCPs and there would be no significant noise exposure impacts relative to airport or airstrip noise levels.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Noise

Support for this environmental impact conclusion is fully discussed starting on page 5.12-59 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Cumulative projects in SCAG's North Los Angeles County Subregion would have the potential to result in a cumulative noise impact if they would, in combination with regional growth in the immediate area, create excessive community noise levels. The traffic noise levels predicted for buildout conditions and evaluated in Impacts 5.12-2 and 5.12-3 are based on cumulative traffic conditions that take into account cumulative development in the region. Therefore, these impact discussions inherently incorporate the cumulative scenario by default. Further, cumulative projects under the buildout of the Proposed Project would be required to comply with the applicable land use compatibility classification or they would not be approved without a general plan amendment. Therefore, the Proposed Project would not contribute to a significant cumulative noise impact above and beyond what has already been identified above.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

12. Population and Housing

Impact 5.13-1: The Proposed Project would directly result in population growth in the Project Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.13-5 of Section 5.13, *Population and Housing*, of the DEIR.

Facts in Support of Finding:

The estimated buildout population of the Proposed Project is 405,410 residents, which is expected to occur sometime after 2035. SCAG projects the population in the Project Area plus unincorporated parts of the Santa Clarita Valley to increase to 302,005 by 2035. The mixture of land uses and densities prescribed in the Proposed Project can accommodate the growth projected by SCAG by 2035; therefore, the project is consistent with SCAG's RTP/SCS.

The Proposed Project accommodates up to 106,180 housing units, and although buildout is not expected to occur by 2035, the opportunities for housing development provided in the Proposed Project are consistent with SCAG growth projections for 104,815 units in the Project Area and unincorporated portions of the Santa Clarita Valley by 2035. The housing and population growth allowed under the Proposed Project is consistent with SCAG projections and do not constitute a significant adverse environmental impact.

The Proposed Project buildout accommodates up to 134,351 jobs at full buildout. This growth is expected to occur over a long period of time, well beyond the 2035 timeframe that is used by SCAG for planning purposes. However, the amount of growth allowed is consistent with SCAG's projection of 97,763 jobs by 2035 for the Project Area and only the unincorporated areas within the Santa Clarita Valley.

As described above in Section 5.13.3, the Proposed Area Plan includes land use policies to promote the development of housing appropriate for the communities within the Project Area, provide adequate housing opportunities for all segments of the community, and maintain a balance of jobs and housing units. These policies are consistent with regional and statewide efforts to coordinate housing, land use, transit, and other types of infrastructure planning included in Assembly Bill 32 and State Bill 375.

Jobs-housing balance is achieved by increasing opportunities for people to work and live in close proximity. The ratio is expressed as the number of jobs divided by the number of housing units. SCAG uses the jobs-housing balance as a general tool for analyzing where people work, where they live, and how efficiently they can travel between the two. In the Project Area, the existing jobs-housing balance in 2013 is 1.3. The jobs-housing balance of the Proposed Project buildout is also 1.3. One of the most cited studies of jobs-housing balance recommends 1.3 to 1.7 as the range for an ideal jobs-housing balance (Ewing 1996). Table 5.13-5 in the DEIR compares the existing housing unit, population, employment, and jobs-housing balance data with the Proposed Project buildout. Since the Proposed Project maintains an appropriate balance between jobs and housing, no significant impacts are anticipated.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.13-2: Project implementation would not result in the displacement of people and/or housing.

Support for this environmental impact conclusion is fully discussed starting on page 5.13-6 of Section 5.13, *Population and Housing*, of the DEIR.

Facts in Support of Finding:

The Project Area is developed with a variety of land uses including residential, commercial, industrial, and open space. The Proposed Project would allow existing uses to continue even where new zoning and land use designations are proposed under the Proposed Project. None of the existing uses would be forced to be removed or relocated as a result of the project implementation. Compliance with the Proposed Project will facilitate the development of a variety of housing types by providing a supply of land that is adequate to accommodate SCAG growth projections.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Population and Housing

Support for this environmental impact conclusion is fully discussed starting on page 5.13-6 of Section 5.13, *Population and Housing*, of the DEIR.

Facts in Support of Finding:

The cumulative projects in the Antelope Valley would have the potential to result in a significant cumulative impact if they would, in combination, directly or indirectly induce substantial population growth. The planning documents, such as general plans prepared by cities, would be subject to regional plans such as SCAG's Regional Comprehensive Plan (RCP) and the RTP/SCS, similar to the Proposed Project. The general plans of adjacent jurisdictions have been prepared to be consistent with the population forecast of the regional planning documents. Thus, these projects would accommodate anticipated future growth, not induce new growth, similar to the Proposed Project.

As discussed in Section 4.4 of the DEIR, Assumptions Regarding Cumulative Impacts, the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes the Project Area, the unincorporated Santa Clarita Valley, as well as the incorporated cities of Lancaster, Palmdale, and Santa Clarita. Cumulative growth projections for the North Los Angeles County Subregion are shown in Table 5.13-6 of the DEIR.

As shown in Table 5.13-6, the Proposed Project would be adequate to accommodate SCAG's planned growth through 2035; therefore, it is unlikely that the Proposed Project would induce population growth in surrounding jurisdictions. In addition, the jobs/housing ratio for the Proposed Project is 1.3, which is better than the 0.94 jobs/housing ratio projected by SCAG for the region in 2035. This is a beneficial impact of the Proposed Project. Since cumulative projects would be required to comply with applicable land use plans governing regional growth, a significant cumulative impact would not occur. Therefore, the Proposed Project, in combination with other cumulative growth in SCAG's North Los Angeles County subregion, would not contribute to a significant cumulative population and housing impact.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

13. Public Services

Cumulative Impacts: Fire Protection and Emergency Services

Support for this environmental impact conclusion is fully discussed starting on page 5.14-8 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts,* of the DEIR, the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas of North Los Angeles County as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita. Cumulative growth within North Los Angeles County would result in a need for additional fire protection services to serve new development. Cumulative projects proposed under general plans of surrounding cities and counties, such as commercial, residential, or industrial projects, would require fire protection services from fire agencies within the region. In order to maintain adequate travel times to serve cumulative projects, the construction or expansion of fire protection facilities would be required, which would have the potential to result in an adverse impact on the environment. While the majority of cumulative projects involve discretionary actions and therefore would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for fire services, which would have the potential to result in a significant cumulative impact. However, these impacts would be mitigated through the County's Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment and compliance with the County Fire Code.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.14-2: Buildout of the Proposed Project would introduce new structures, residents, and employees into the LASD service boundaries, thereby increasing the requirement for law enforcement facilities and personnel.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-14 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would result in construction of residences (single- and multi-family) and nonresidential uses, including commercial, retail, office, business park uses, fire stations, schools, and open areas. The LASD would provide general law enforcement for the Project Area. It is anticipated that the demand for law enforcement services would increase substantially above current levels due to development allowed by the Proposed Project and the resulting increase in population. At buildout, an additional 311,920 residents would be located in the Project Area and require law enforcement services. Without additional staffing and facilities, the projected population increase

would decrease the existing level of service of the LASD. The need for additional staffing could result in the need to expand or construct new facilities to serve the additional population.

Using a desired officer-to-population ratio of one officer to every 1,000 residents, identified above, an additional 312 officers would be needed at buildout of the Proposed Project. As future development projects are implemented, LASD will review each project for potential impacts to their facilities and personnel. If determined to be necessary, mitigation will be imposed to fund capital facilities and equipment for the LASD. Currently, no mitigation fee has been adopted for the majority of the Project Area, which is expected to grow by 311,920 residents.

Operational funding for the LASD is derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the County's General Fund. The County Board of Supervisors then allocates the revenue for various County-provided public services, including Sheriff's services. As future development occurs, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury. A portion of these revenues would be allocated to the LASD during the County's annual budget process to maintain staffing and equipment levels to adequately serve project-related increases in service-call demands.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Law Enforcement

Support for this environmental impact conclusion is fully discussed starting on page 5.14-15 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts,* the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas in North Los Angeles County, as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita. Cumulative projects in North Los Angeles County would require increased law enforcement services to serve new development. Cumulative projects proposed under general plans of cities, such as commercial, residential or industrial projects, would require law enforcement services. The increase in demand for law enforcement services from implementation of cumulative projects would have the potential to result in the need to construct or expand existing police facilities, which would have the potential to create an adverse impact on the environment. While the majority of cumulative projects require discretionary actions and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for law enforcement services, which would have the potential to result in a significant cumulative impact. Operational funding for LASD and the police departments serving cities in Los Angeles County is derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the General Fund. Provided that staff and facilities are expanded to serve future development in the Project Area and cities, no significant cumulative impacts to law enforcement are anticipated.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.14-3: Buildout of the Proposed Project would generate new students who would impact the school enrollment capacities of area schools.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-21 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

Educational facilities within the Project Area have their own state-mandated requirements to ensure a high quality of life for all the citizens of the County. School districts offer education to all school-age residents of the region, but operate entirely independent of County government. School districts were created by the State and are subject to the overview of the State Legislature. Elected governing school boards are responsible for budgeting and decision-making. The State Department of Education establishes school site and construction standards.

Table 5.14-3 in the DEIR identifies the housing units and student population projected for the Project Area. As shown in Table 5.14-3, a total of 57,009 additional students are anticipated at buildout of the Proposed Project. The Proposed Project would result in housing and population growth throughout the Project Area, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required.

Implementation of the Proposed Project could contribute to a potentially significant adverse cumulative impact on school facilities and services. However, under state law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the Legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to implementation of the Proposed Project would be adequately mitigated by the payment of SB 50 fees.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: School Services

Support for this environmental impact conclusion is fully discussed starting on page 5.14-22 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

Cumulative development projects that involve residential development would increase the public school population in the region and require the construction or expansion of school facilities so that adequate service ratios are maintained. As described in Section 4.4, *Assumptions Regarding Cumulative Development,* an additional 103,605 dwelling units are anticipated by 2035 within the North Los Angeles County Subregion. This would result in an additional 72,524 students. This increase in student population would require the construction or expansion of school facilities, which would result in adverse environmental impacts. While the majority of cumulative projects require discretionary actions and would be required to demonstrate compliance with CEQA and/or NEPA

prior to project approval, they would incrementally increase the need for school facilities, which would have the potential to result in a significant cumulative impact.

As discussed above, under state law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the Legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act…on the provision of adequate school facilities" (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to cumulative development would be adequately mitigated to a less than significant level by the payment of SB 50 fees.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.14-4: Buildout of the Proposed Project would generate additional population, increasing the service needs for the local libraries.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-27 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would result in the potential for increased demand for library services within the Project Area to the extent that expansion and construction of new facilities would be required. The projected increase in population at buildout of the Proposed Project is 311,920 persons. As discussed above, the current guideline for library facility space is a minimum of 0.5 gross square foot per capita and 2.75 items (books and other library materials) per capita. To adequately serve future residents within the Project Area, the County library system would need to add 857,780 library items and 155,960 square feet of library space.

Future development would generate new tax revenues, and as noted above, funding sources for the County Library consist of property taxes, state assistance, and revenue from fines, fees, and other miscellaneous revenue. According to County Library staff, increased tax revenues funding addresses only library operations, and because of uncertainty regarding General Fund contribution levels, it is not adequate to offset the impact of the project on the County Library's ability to construct new libraries and purchase new items (books, periodicals, audio cassettes, videos, etc.). Consequently, the tax revenues collected would not adequately cover all the costs of serving the population in the Project Area, and a significant impact on the library system would result.

In order to minimize potentially adverse effects, the County has devised library facilities mitigation fee programs, and future residential projects would be required to remit payment pursuant to the Countywide program to account for library-related construction and acquisition costs. Requiring payment of the library facilities fee in effect at the time development occurs (currently $718.00 per unit of residential development) would mitigate project-related impacts on the County Library to a less-than-significant level.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Library Services

Support for this environmental impact conclusion is fully discussed starting on page 5.14-27 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

The County Public Library serves the North Los Angeles County Subregion. Cumulative projects that involve residential development would increase the population of library users and result in the need to construct additional or renovate existing library facilities, which would result in a significant environmental impact. Cumulative projects that would contribute to additional library use include residential development proposed under the general plans of cities as well as buildout of the Project Area allowed by the Proposed Project. The increase in demand for library services from implementation of cumulative projects would result in the need to construct additional or expand existing library facilities, which would create an adverse impact on the environment. While the majority of cumulative projects require discretionary actions and would be required to demonstrate compliance with CEQA prior to project approval, they would incrementally increase the need for library facilities and materials, which would have the potential to result in a significant cumulative impact.

Future cumulative development would generate new tax revenues, and as noted above, funding sources for the County Library and city libraries consist of property taxes, state assistance, and revenue from fines, fees, and other miscellaneous revenue. In order to minimize potentially adverse effects, the County has devised library facilities mitigation fee programs, and future projects would be required to remit payment pursuant to the Countywide program to account for library-related construction and acquisition costs. Requiring payment of the library facilities fee in effect (currently $718.00 per unit of residential development) would mitigate cumulative impacts on the County Library to a less-than-significant level, and they are therefore not cumulative considerable.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

14. Recreation

Impact 5.15-1: Development in accordance with the Proposed Project would generate additional residents that would increase the use of existing parks and recreational facilities such that substantial physical deterioration may occur or be accelerated.

Support for this environmental impact conclusion is fully discussed starting on page 5.15-11 of Section 5.15, *Recreation*, of the DEIR.

Facts in Support of Finding:

An increase in population, regardless of location, would result in increased demand for recreational facilities, potentially resulting in the deterioration of existing facilities. As shown in Table 3-2 in Chapter 3, *Project Description*, of this DEIR, the Project Area is anticipated to contain 81,441 additional dwelling units and 311,920 additional residents at buildout of the Proposed Project. This represents population growth of 333.6 percent during the planning period. The anticipated increase in population would result in an increase in demand for recreational facilities. Additionally, increases in population in areas that currently have inadequate recreational facilities would have the potential to accelerate deterioration of these facilities from intensified overuse.

The recreational acreage goal identified in the Proposed Area Plan is four acres per 1,000 residents (Policy PS 8.3). The County's Adopted General Plan has a recreational acreage goal of four acres of local parkland per 1,000 residents and six acres of regional parkland per 1,000 County residents. As shown in Table 5.15-3, *Existing Parkland in the Project Area*, of the DEIR, the Project Area is currently meeting the regional parkland goal, but not the local parkland goal.

Recreational acreage goals serve as the baseline level of service standard that guides the planning and monitoring of recreational facilities. They are used as planning tools. However, recreational facilities are not automatically considered deficient if these goals are not met. Using the Proposed Area Plan and General Plan parkland goals, the Proposed Project's demand for local and regional parkland is shown in Table 5.15-5, *Increases in Population and Demand for County Parkland*, of the DEIR.

Currently, there is a total of 3,870 acres of regional parkland in the Project Area and adjacent cities. For every 1,000 residents, there is approximately 10 acres of regional parkland. Based on the Adopted General Plan's goal, there is a 1,573-acre surplus of regional parkland under existing conditions.

As discussed in Chapter 3, *Project Description*, of the DEIR, the Project Area is expected to have a total of 405,410 residents at project buildout, an increase of 311,920 residents. To meet the Adopted General Plan goal of six acres of regional parkland per 1,000 residents of the total population of Los Angeles County, a total of 1,872 acres of regional parkland would need to be provided. As shown in Table 5.15-5, *Increases in Population and Demand for County Parkland*, of the DEIR, there are currently 3,870 acres of regional parkland, which indicates an existing surplus of 1,573 acres of regional parkland. This surplus of 1,573 is less than the projected need for 1,872 additional acres. Therefore, if no additional regional parks were built in the Project Area prior to project buildout, the Project Area would have a deficiency of 299 acres. However, this deficiency is misleading in that it does not include regional recreational amenities not administered by the County—including State Parks and the ANF—and regional parks that would be constructed in the cities of Lancaster and Palmdale during the planning period pursuant to those cities' parkland dedication ordinances (see discussion under *Local Parkland*, below). These areas contribute to the overall availability of regional recreational opportunities in the Project Area.

The current ratio of local parkland is 0.54 acres of local parkland for every 1,000 residents in the Project Area. Based on the Adopted General Plan and Proposed Area Plan's desired ratio of four acres of local parkland per 1,000 residents, there is currently a 324-acre deficit of local parkland. Although there is an existing local park deficiency, there are a number of other recreation and open space assets that serve to reduce the demand for local park facilities. The considerable amount of regional parkland, state parks, trails, and private recreational facilities available to the residents of the Project Area (see 5.15.1.2, *Existing Conditions*, above) substantially reduces the demand for local park facilities.

As shown in Table 5.15-5 of the DEIR, buildout of the Proposed Project is anticipated to generate 311,920 new residents, resulting in a total population of 405,410 in the Project Area. To meet the County's adopted goal for local parkland for the new population, the County would need to provide 1,247 new acres of local parkland, or 1,622 acres total. The County currently falls short of its goal for local parkland and would not be able to accommodate the Proposed Project's additional demand through existing local parkland inventory. However, given the local parkland deficiency, the inability of the County to meet the Adopted General Plan goal of four acres of local parkland for every 1,000 residents upon buildout of the Proposed Project would not in and of itself result in a significant physical deterioration of recreation facilities. Increases in parkland acreage proportional to the increases in population (or sufficient increases in maintenance) would be adequate to assume that a substantial physical deterioration of facilities would not occur.

The extent to which the County can implement parks, trails, and other recreational facilities is related to the availability of funding. As discussed, the Quimby Act is a funding mechanism for parkland acquisition. As allowed by this Act and pursuant to the County Code, residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances) to enable the County to acquire a ratio of at least three acres of local parkland for every 1,000 residents (Section 21.24.340). This provision assures that the funding for parkland acquisition will be proportional to increases in population. Other regulations, including the Mello-Roos Community Facilities Act of 1982, the Landscaping and Lighting Act of 1972, and Los Angeles County Proposition A (Safe Neighborhood Parks Proposition of 1992 and 1996), would serve as supplemental sources of funding for parkland. Additionally, the County requires a residential subdivider to either dedicate local park space to serve the proposed subdivision, pay in-lieu fees, provide local park space less than required but developed with amenities equal in value to the park fee, or do a combination of the above in accordance with the requirements of County Ordinance 2013-0009.

The provisions of County Code Section 21.24.340 require three acres of local parkland per 1,000 residents, while the Proposed Area Plan Policy PS 8.3 sets a goal of four acres per 1,000 residents. As a result, there is an inherent deficit between the ratio of local parkland the County would like to maintain and the amount of parkland it can provide in accordance with County Code Section 21.24.340. Therefore, although much of the demand for local parkland can be accommodated, a deficit of parkland would remain compared to the Proposed Area Plan's goal.

Nevertheless, numerous policies in the Proposed Area Plan listed under Section 5.15.3, *Relevant Area Plan Goals and Policies*, would reduce the significance of this impact. For example, Policy PS 8.1 ensures adequate funding on an ongoing basis; Policies PS 8.5 and 8.7 encourage additional recreational opportunities through the use of school playgrounds/sports fields, trails, bikeways, and bicycles routes; and Policy PS 8.6 promotes implementing parks and recreational facilities at gathering places within town centers as a way to allow neighbors to meet and socialize. Perhaps most importantly, Policy PS 8.3 reiterates the Adopted General Plan's goal that four acres of parkland be provided for every 1,000 residents.

The presence of a variety of recreation options beyond local park facilities and policies that require funding for parks to be proportional to future increases in population and development would both serve to reduce the potential for significant deterioration of recreational facilities associated with buildout of the Proposed Project. Therefore, impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.15-2: Implementation of the Proposed Project would result in the construction or expansion of recreational facilities.

Support for this environmental impact conclusion is fully discussed starting on page 5.15-14 of Section 5.15, *Recreation*, of the DEIR.

Facts in Support of Finding:

Implementation of the Proposed Project would require the construction and expansion of new recreational facilities to serve the forecasted population growth in the Project Area. Although the Proposed Project does not specifically site or plan recreational facilities, it would allow for the development of future recreational facilities, including parks, trails, and athletic fields, within many land use designations, including residential designations.

While the Proposed Project does recognize the need for additional recreational facilities, considering that the Proposed Project is a programmatic planning document, it does not contain actual development proposals with locations or project-specific details. Rather, the Proposed Project sets forth goals and policies, which are intended to guide the development of the Project Area.

Development pursuant to the Proposed Project would result in the construction of new recreational facilities and expansion of existing facilities. Development and operation of new recreational facilities may have an adverse physical effect on the environment, including impacts relating to air quality, biological resources, lighting, noise, and traffic. Environmental impacts associated with construction of new and/or expansion of recreational facilities in accordance with the Proposed Project are addressed separately (see appropriate environmental topical areas in Chapter 5, *Environmental Analysis*). However, it is speculative to determine the location of proposed park facilities and impacts arising from the development of individual park projects. Implementation of goals and policies in the Proposed Area Plan, including Policy COS 18.5 and Policies PS 8.1 through PS 8.9 would guide the development of future recreational facilities. Moreover, existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails pursuant to buildout of the Proposed Project. Furthermore, subsequent environmental review would be required for development of park projects under existing regulations. Consequently, the Proposed Project would not result in significant impacts relating to new or expanded recreational facilities.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Recreation

Support for this environmental impact conclusion is fully discussed starting on page 5.15-14 of Section 5.15, *Recreation*, of the DEIR.

Facts in Support of Finding:

Buildout of the Proposed Project would increase use of existing local and regional parks and could result in the accelerated deterioration of recreational facilities. Some cumulative projects, such as those associated with buildout of general plans for the cities of Lancaster and Palmdale, would have the potential to increase the demand for recreational facilities, potentially resulting in deterioration of existing facilities. Cumulative development would incrementally increase the need for new or expanded facilities, which would have the potential to result in adverse environmental effects.

As discussed in Chapter 3, *Project Description*, the Project Area is anticipated to have a population of approximately 405,410 at buildout of the Proposed Project. As discussed in Section 5.13, *Population and Housing*, SCAG estimates that the combined population of the cities of Lancaster and Palmdale is estimated to be 407,453 in 2035. Therefore, the Project Area and adjacent cities are expected to have approximately 812,863 residents in 2035. To meet the Adopted General Plan goal of six acres of regional parkland per 1,000 residents (including residents of incorporated cities), a total of 4,877 acres of regional parkland would need to be in place at project buildout. As shown in Table 5.15-3, *Existing Parkland in the Planning Area*, of the DEIR, there are currently 3,870 acres of regional parkland in the Project Area and adjacent cities. Although the existing amount of regional parkland available to Planning Area residents would not be sufficient to meet the County's goal at buildout of the Proposed Project, overall regional parkland would be expected to grow well beyond the existing inventory of regional parks. Deterioration that would occur to local parks and recreational facilities resulting from regional population growth would be offset with funding from new development such

as in-lieu fees for parks or donation of parkland pursuant to the Quimby Act. As discussed, the Quimby Act is a funding mechanism for parkland acquisition for jurisdictions. As allowed by this Act, most cities in Los Angeles County—including the cities of Lancaster and Palmdale—have park dedication ordinances as part of their municipal codes. These ordinances require most residential subdivisions to dedicate parkland or pay in-lieu fees to enable the jurisdictionsto acquire local parkland at ratios between three acres and five acres per 1,000 residents. Consistent with established park dedication ordinances, additional parks and recreational facilities would be developed and constructed in the Project Area.

Existing regulations do not assure that the funding for parkland acquisition would be proportional to increases in population. The provisions of County Code Sections 21.24.340, 21.24.350, 21.28.120, 21.28.130, and 21.28.140 require three acres of local parkland per 1,000 residents, while Proposed Area Plan Policy PS 8.3 sets a goal of six acres per 1,000 residents. As a result, there is an inherent deficit between the ratio of local parkland the County would like to maintain and the amount of parkland it can provide in accordance with County Code Section 21.24.340. Therefore, although much of the demand for local parkland can be accommodated, a deficit of parkland would remain compared to the County's goal. However, regulations, including the Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972, would serve as supplemental sources of funding for parkland. Overall, enforcement of existing parkland dedication requirements would serve to reduce the potential for deterioration of facilities by allowing for adequate funding for the provision and maintenance of recreational facilities. Therefore, impacts would be less than significant.

It is speculative to determine the location of proposed park facilities in the Project Area and impacts arising from development of individual park projects. The majority of cumulative projects would be discretionary and would be required to demonstrate compliance with CEQA prior to project approval; existing federal, state, and local regulations would mitigate potential adverse impacts to the environment that may result from the expansion of parks, recreational facilities, and trails. Therefore, the Proposed Project would not result in a cumulatively considerable contribution to a significant cumulative impact associated with deterioration of parks and construction of recreational facilities.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

15. Transportation and Traffic

Impact 5.16-2:	Implementation of the Proposed Project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Support for this environmental impact conclusion is fully discussed starting on page 5.16-45 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The Proposed Project will result in a significant impact to air traffic patterns if it causes an increase in air traffic levels or introduce incompatible land uses. The Proposed Project will not result in the development of a new airport within the County nor will it introduce new land uses that could prevent safety hazards to air traffic. The Proposed Project has policies aimed at improving the compatibility between aviation facilities and their surroundings, encouraging greater multi-modal access to airports and encouraging the development of a decentralized system of major airports.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.16-3:	Implementation of the Proposed Project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Support for this environmental impact conclusion is fully discussed starting on page 5.16-45 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The Proposed Project promotes highways to be built to specific standards that have been set by the County. These include increasing the number of lanes on major highways and other improvements under the Highway Plan. Hazards due to roadway design features will be evaluated on a project-by-project basis as the buildout of the Proposed Project occurs. All new highways and upgrades will be planned, designed and built to County standards.

The County periodically monitors levels of service, traffic accident patterns, and physical conditions of the existing street system, and upgrade roadways as needed. Additionally, the County applies consistent standards throughout the Highway Plan for street design to promote travel safety. It will accomplish this by designating roadways based on their functional classification, adopting consistent standard street cross sections, coordinating circulation plans of new development project with each other, and adopting common standards for pavement width. Within residential neighborhoods, complete streets may be promoted through traffic-calming devices, shorter block length, and other considerations. Where possible, local street patterns could be designed to create logical and understandable travel paths for users and discourage cut-through traffic.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.16-4:	Implementation of the Proposed Project would not result in inadequate emergency access.

Support for this environmental impact conclusion is fully discussed starting on page 5.16-46 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

Emergency access will be evaluated on a project-by-project basis as the buildout of the Proposed Project occurs. Buildout of the Proposed Project will enhance the capacity of the roadway system by upgrading roadways and intersections when necessary, ensure that the future dedication and acquisitions of roadways are based on projected demand, and implement the construction of paved crossover points through medians for emergency vehicles. Additionally, the Proposed Project will facilitate the consideration of the needs for emergency access in transportation planning. The County will maintain a current evacuation plan, ensure that new development is provided with adequate emergency and/or secondary access, including two points of ingress and egress for most subdivisions, require visible street name signage, and provide directional signage to freeways at key intersections to assist in emergency evacuation operations.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.16-5:	Implementation of the Proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Support for this environmental impact conclusion is fully discussed starting on page 5.16-46 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The Bicycle Plan was adopted by the County Board of Supervisors on March 13, 2012. The Bicycle Plan, which replaces the 1975 Plan of Bikeways, is a sub-element of the Transportation Element of the Adopted General Plan. The Bicycle Plan proposes approximately 831 miles of new bikeways throughout the County. Along with the proposed bikeways, the Bicycle Plan recommends various bicycle-friendly policies and programs to promote bicycle ridership among users of all ages and skill sets within the County. A Final Program EIR (State Clearinghouse No. 2011041004) for the Bicycle Plan was completed. The Bicycle Plan also contains elements that support alternative transportation programs, including increased ridership on public transit, developing mass transit as an alternative to automobile travel, the development of rail transit or exclusive bus lanes in high demand corridors, as well as research for and development of new transportation technologies.

The Proposed Project supports alternative modes of transportation, including walking, bicycling, and equestrian travel to reduce total vehicle miles traveled (VMT). Additionally, the Proposed Project establishes several policies to ensure the safety and mobility of pedestrians, bicyclists and equestrian users. The County will ensure that through review of future development projects, safe and convenient access is provided to safe transit, bikeways, walkways and multi-purpose trails; the safety and convenience of pedestrians, cyclists and equestrian users is considered in the design and development of transportation systems; safe pedestrian connections are provided across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations; consistent standards will be adopted for implementation of Americans with Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops. The Bicycle Plan also contains many programs and policies that would mitigate potential hazards or barriers for bicyclists.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

16. Utilities and Service Systems

Impact 5.17-1:	Wastewater generated by buildout of the Proposed Project would not exceed wastewater treatment requirements of any of the four Regional Water Quality Control Boards having jurisdiction in Los Angeles County.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-8 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Individual development projects built consistent with the Proposed Project would be subject to the following construction and operational requirements:

Wastewater treatment requirements for discharges to stormwater in the Lahontan RWQCB region are regulated under Sections J110 and J111 of Title 26 of the County Code, and with Chapter 21 of the Los Angeles County Flood Control District Code. SWPPPs, which estimate sediment risk from construction activities to receiving waters, and specify BMPs that would be used by the project to minimize pollution of stormwater, are required for construction sites with a disturbed, graded area of one acre or greater. SWPPPs are also required under the Statewide General Construction Permit for construction sites of one acre or greater area in the portions of the Project Area in the Los Angeles, and Central Valley RWQCB regions. Note that the great majority of the developed area in the Project Area is in the Lahontan RWQCB region; the portion of the Project Area in the Los Angeles RWQCB region is mostly uninhabited areas of the San Gabriel Mountains.

Unauthorized waste discharges to Waters of the State are prohibited. Such waste discharges may be authorized under an Individual Permit.

Discharge limits for concentrations of hazardous materials – and other substances that could interfere with wastewater treatment processes – discharged into sanitary sewers are set by wastewater treatment agencies. Wastewater treatment facilities can treat sanitary wastewater meeting discharge limits. Implementation of the Proposed Project policies and required regulations would mitigate this impact and impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.17-2: Sanitary wastewater generated by buildout of the Proposed Project could be adequately treated by the wastewater treatment providers serving the unincorporated areas.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-9 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Wastewater generation at Proposed Project buildout from all land uses is estimated as 76 gallons per capita per day (gpcd). The forecast net increase in population due to Proposed Project buildout is 311,920. Therefore, forecast net increase in wastewater generation is about 23.7 million gallons per day.

Residual wastewater treatment capacity is capacity that is currently unused and is available to accommodate future growth. The residual capacities reported below are calculated from capacities and average flows reported above in Section 5.17.1.1, *Environmental Setting.*The Lancaster WRP had residual capacity of 3 MGD in 2013, and the Palmdale WRP had residual capacity of 3.3 MGD, for a total capacity of 6.3 MGD in the Project Area. Currently there is not adequate residual wastewater treatment capacity in the Project Area to accommodate the projected net increase in wastewater generation due to Proposed Project buildout.

Capital improvements to LACSD water reclamation plants are funded from connection fees charged to new developments, redevelopments, and expansions of existing land uses. The connection fee is a capital facilities fee used to provide additional conveyance, treatment, and disposal facilities (capital facilities) required by new users connecting to the LACSD's sewerage system or by existing users who significantly increase the quantity or strength of their wastewater discharge. The Connection Fee Program ensures that all users pay their fair share for any necessary expansion of the system (Raza 2013). Estimated wastewater generation factors used in determining connection fees in the LACSD's 22 member Districts are set forth in the Connection Fee Ordinance for each respective District available on LACSD's website.

Projects developed pursuant to the Proposed Project would pay connection fees to the LACSD as applicable. Payments of such fees would reduce adverse impacts to wastewater generation capacity in the Project Area.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Wastewater Treatment and Collection

Support for this environmental impact conclusion is fully discussed starting on page 5.17-9 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts,* of the DEIR, the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas of Los Angeles County located within the Antelope Valley and Santa Clarita Valley areas, as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita.

Cumulative forecasted wastewater generation for the Proposed Project and future cumulative development are shown in Table 5.17-1 of the DEIR. As discussed above, total wastewater treatment capacity in the Project Area is 29 MGD, and the combined residual treatment capacity at the two WRPs is 6.3 MGD.

The LACSD provides wastewater treatment in the Santa Clarita Valley at two water reclamation plants:

- The **Valencia WRP** has 21.6 MGD capacity; and in 2013 had average wastewater flows of 14.5 MGD and residual capacity of 7.1 MGD.

- The **Saugus WRP** has 6.2 MGD capacity; and in 2013 had average wastewater flows of 5.2 MGD and residual capacity of 1.0 MGD.

The total residual capacity of the four WRPs serving the Project Area and the Santa Clarita Valley in 2013 was 14.4 MGD.

The impacts of the buildout of the Santa Clarita Valley Area Plan on wastewater treatment capacity were thoroughly analyzed in the certified Program EIR for the Santa Clarita Valley Area Plan. Impacts were identified as less than significant in the certified Santa Clarita Valley Area Plan Program

EIR. The analysis and less than significant impact conclusion is incorporated by reference in this DEIR.

Cumulative wastewater generation for the North Los Angeles County Subregion is projected to be approximately 71.9 MGD in 2035. Total wastewater treatment capacity in the Project Area and the Santa Clarita Valley area is 56.8 MGD, which is inadequate to serve the projected population for 2035. New and/or expanded wastewater treatment facilities would be required to meet such demands. However, cumulative impacts would be less than significant since cumulative development projects would pay connection fees to the LACSD as applicable. Payments of such fees would fund treatment plant expansions necessary to serve future development. Therefore, cumulative impacts related to wastewater treatment are not considered significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.17-4: Existing and/or proposed facilities would be able to accommodate project-generated solid waste and comply with related solid waste regulations.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-39 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Generation of solid waste would increase as the population increases with buildout of the Proposed Project. Correspondingly, there would be a need for additional landfill capacity and related support facilities.

Buildout of the Proposed Project is forecast to result in a net increase in population in the Project Area of 311,920; and total population at buildout of 405,410. The Proposed Project buildout would allow for: 106,180 residential dwelling units; 130,226,370 square feet of nonresidential land uses; and employment of 134,351. Buildout of the Proposed Project would result in 81,441 additional residential dwelling units compared to existing land uses.

Solid waste generation is estimated as 4.5 pounds of solid waste per person per day. Thus, the net increase in solid waste generation by Proposed Project buildout is about 1.40 million pounds per day – that is, about 700 tons per day; and total solid waste generation in the Project Area at Proposed Project buildout is estimated at about 1.82 million pounds per day, or about 910 tons per day. Both the forecasted net increase in of about 700 tons per day, and the forecast total solid waste generation of about 910 tons per day, are well within the total 3,278 tons daily residual disposal capacity of the two landfills described in Table 5.17-8 of the DEIR. The County would maintain 15 years' identified disposal capacity in conformance with AB 939. Proposed Project buildout would not require construction of new or expanded landfills, and impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Solid Waste

Support for this environmental impact conclusion is fully discussed starting on page 5.17-40 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts,* the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas of Los Angeles County located within the Antelope Valley and Santa Clarita Valley, as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita.

Cumulative forecasted solid waste generation for the Proposed Project and future cumulative development are shown in Table 5.17-9 of the DEIR. As discussed above, total daily solid waste disposal capacity in the Project Area is 4,800 tons per day, and the combined residual disposal capacity at the two landfills in the Project Area is 3,278 tons per day.

Forecast solid waste generation from the entire North County Subregion in 2035 is about 4.26 million pounds per day – or 2,130 tons per day – and forecast solid waste generation from the Project Area at Proposed Project buildout is about 1.82 million pounds per day, or 910 tons per day.

In 2013 about 95 percent of the solid waste from the City of Santa Clarita was disposed of at two landfills: the Chiquita Canyon Sanitary Landfill in the community of Castaic in unincorporated County in the Santa Clarita Valley area, and the Sunshine Canyon City/County Landfill in the community of Sylmar, City of Los Angeles on the border between the Santa Clarita Valley and San Fernando Valley (CalRecycle 2014a). Disposal information by landfill is not available for unincorporated areas in subregions of Los Angeles County; it is assumed here that most landfilled solid waste from unincorporated areas in the Santa Clarita Valley area is disposed of at the same two landfills. Capacities and estimated closing dates for the two landfills are shown in Table 5.17-10 of the DEIR. As shown in Table 5.17-10, the two landfills have combined residual daily disposal capacity of 7,909 tons. The total residual daily disposal capacity of the four landfills serving the Antelope Valley and Santa Clarita Valley areas is 11,187 tons.

There is adequate residual daily disposal capacity at the four landfills serving the North County Subregion for cumulative solid waste generation, and cumulative impacts would be less than significant.

Regulatory Compliance

As with projects in the unincorporated areas, projects in cities would comply with AB 341 and Section 5.408 of the California Green Building Standards Code. AB 341 requires recycling by commercial and multifamily residential land uses and schools. California Green Building Standards Code Section 5.408 requires recycling and/or reuse of at least 50 percent of nonhazardous construction and demolition waste from nonresidential construction operations. Cities, as well as the County, would comply with requirements in AB 939 for solid waste diversion. Impacts would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Impact 5.17-5: Existing and/or proposed facilities would be able to accommodate project-generated utility demands.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-47 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Growth in the Project Area would result in additional demand for electricity service. Presently and for the foreseeable future, the national and regional supply of electrical energy is not in jeopardy. The acceleration of the approval and licensing process of additional state power plants will ensure an adequate supply of electricity for state consumers. Past shortages of electricity were solved by the additional power plants being brought "online" in California. The matter of electrical generation capacity is not one of physical shortages due to power plant limitations; rather, it is a function of market forces and the wholesale cost of electricity.

Implementation of the Proposed Project would result in increased demand in electricity service to the Project Area. New development occurring from buildout of the Proposed Project would be subject to Title 24, Part 6of the California Administrative code, the Energy Efficiency Standards for Residential and Nonresidential Buildings, which requires local jurisdiction to use energy efficient appliances, weatherization techniques and efficient cooling and heating systems to reduce energy demand stemming from new development.

Forecast electricity demands by Proposed Project buildout are shown in Table 5.17-11 of the DEIR. The forecasted net increase in electricity demand due to Proposed Project buildout is about 4.1 billion kWh per year, or about 4,100 GWH per year, and is within SCE's demand forecast for its service area. Therefore, impacts of Proposed Project buildout on electricity supplies would be less than significant.

Estimated natural gas demands by Proposed Project buildout are shown in Table 5.17-12 of the DEIR. The estimated net increase in natural gas demand is about 53.4 million therms per year, that is, 14.2 million cubic feet of natural gas per day. Forecasted natural gas demands due to the Proposed Project buildout are within Southern California Gas Company's (SCGC's) estimated supplies; thus, impacts of the Proposed Project buildout on natural gas supplies would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

Cumulative Impacts: Other Utilities

Support for this environmental impact conclusion is fully discussed starting on page 5.17-48 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

The cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas of Los Angeles County located within the Antelope Valley and Santa Clarita Valley areas, as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita.

Cumulative electricity demands are estimated in Table 5.17-13 of the DEIR. Estimated cumulative electricity demands in 2035 Proposed Project buildout conditions would be about 13.2 billion kWh per year, that is, 13,200 GWH per year, within SCE's demand forecast for its service area. Thus, cumulative impacts on electricity supplies would be less than significant.

Cumulative natural gas demands are estimated in Table 5.17-14 of the DEIR. Cumulative natural gas demands in 2035 Proposed Project buildout conditions would be about 188 million therms per year, or 50 million cubic feet of natural gas per day, within SCGC's natural gas supply forecast. Thus, cumulative impacts on natural gas supplies would be less than significant.

Finding:

Upon implementation of regulatory requirements and standard conditions of approval, this impact would be less than significant.

B. IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The following summary describes impacts of the proposed project that, without mitigation, would result in significant adverse impacts. Upon implementation of the mitigation measures provided in the EIR, these impacts would be considered less than significant.

1. Air Quality

Impact 5.3-5:	Placement of new sensitive receptors near major sources of toxic air contaminants in the Project Area could expose people to substantial pollutant concentrations.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-32 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

The following describes potential impacts of toxic air contaminants (TACs) on new sensitive receptors in the Project Area from implementation of the Proposed Project.

Because placement of sensitive land uses falls outside CARB jurisdiction, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to address the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. This guidance document was developed to assess compatibility and associated health risks when placing sensitive receptors near existing pollution sources.

AVAQMD identifies the following project types (and associated buffer distance) that would require further evaluation to ensure that sensitive receptors would not be exposed to substantial pollutant concentrations:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

Table 5.3-13,*CARB Recommendations for Siting New Sensitive Land Uses*,in the DEIR shows a summary of CARB recommendations for siting new sensitive land uses within the vicinity of air-pollutant-generating sources. Recommendations shown in the table are based on data that show that localized air pollution exposures can be reduced by as much as 80 percent by following CARB minimum distance separations.

CARB's recommendations were based on a compilation of studies that evaluated data on the adverse health effects ensuing from proximity to air pollution sources. The key observation in these studies is that proximity to air pollution sources substantially increases both exposure and the potential for adverse health effects. There are three carcinogenic toxic air contaminants that constitute the majority of the known health risks from motor vehicle traffic: diesel particulate matter (DPM) from trucks and benzene and 1,3 butadiene from passenger vehicles. Potential sources of TACs in the Project Area include stationary sources permitted by SCAQMD and AVAQMD and roadways with more than 100,000 average daily traffic volumes.

Other near-roadway pollutants include ultrafine particles (UFPs). UFPs have also been shown to be toxic and have health impacts.UFPs are emitted from almost every fuel combustion process, including diesel, gasoline, and jet engines, as well as external combustion processes such as wood burning. Consequently, there is growing concern that people living in close proximity to highly trafficked roadways and other sources of combustion-related pollutants (e.g., airports and rail yards) may be exposed to significant levels of UFPs and other air toxics.However, UFPs are not specifically regulated since EPA or CARB have yet to adopt AAQS for these even smaller fractions of PM (SCAQMD 2013).

The Project Area contains or is in proximity to various sources of pollution. Freeways within the Project Area include Interstate 5 (I-5), State Route 138 (SR-138), and SR-14. Table 5.3-14, *Existing Antelope Valley Area Plan Land Uses Within 500 Feet of a Freeway*, identifies existing land uses within 500 feet of a freeway in the Proposed Area Plan. There are no roadways with daily roadway volumes of 50,000 or more either within or near the plan's boundaries. A Union Pacific/Metrolink rail line runs through the community of Acton and north through Palmdale and beyond the northern boundary of the Project Area. Additionally, an east-west transecting Union Pacific rail line starting in the City of Palmdale bisects a portion of the Project Area. The Union Pacific/Metrolink line serves both freight and commuter trains. The Metrolink Antelope Valley Line ends in Lancaster. In addition to freeways and railroads, there are also multiple AVAQMD and SCAQMD-permitted land uses within and near the Project Area that may generate stationary or mobile sources of TACs. Under the Proposed Project, development of new residential land uses would be permitted in proximity to existing and future industrial uses. Additionally, new residential land uses could also potentially be sited near I-5, SR-138, and SR-14 and the existing rail lines. Therefore, air quality compatibility impacts for new sensitive land uses are potentially significant.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

AQ-3 Applicants for sensitive land uses in proximity to the following facilities and within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval:

- Industrial facilities within 1,000 feet
- Distribution centers (40 or more trucks per day) within 1,000 feet

- Major transportation projects (50,000 or more vehicles per day) within 1,000 feet
- Dry cleaners using perchloroethylene within 500 feet
- Gasoline dispensing facilities within 300 feet

When required, the HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones, unless it can be demonstrated to the County by the applicant that there are operational limitations.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measure above. The County hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

Impact 5.3-6: Industrial land uses associated with the Proposed Project could create objectionable odors.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-34 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

The following describes potential odor impacts in Los Angeles County from the implementation of the Proposed Project.

Growth in the Project Area could generate new sources of odors and place sensitive receptors near existing sources of odors. Nuisance odors from land uses in the SoCAB are regulated under SCAQMD Rule 402, *Nuisance*, while odors within the Antelope Valley portion of the MDAB are regulated under AVAQMD Rule 402, *Nuisanc*e. Major sources of odors include wastewater treatment

plants, chemical manufacturing facilities, food processing facilities, agricultural operations, and waste facilities (e.g., landfills, transfer stations, compost facilities).

There are two types of odor impacts: 1) siting sensitive receptors near nuisance odors, and 2) siting new sources of nuisance odors near sensitive receptors. The Proposed Project designates residential areas and industrial areas of the Project Area to prevent potential mixing of incompatible land use types.

- Future non-industrial development would involve minor odor-generating activities, such as lawn mower exhaust and application of exterior paints for building improvement. It should be noted that while restaurants can generate odors, these sources are not typically identified as nuisance odors since they typically do not generate significant odors that affect a substantial number of people.

- Industrial uses, including food processing facilities and waste transfer stations, have the potential to generate substantial odors. Individual projects associated with the Project Area, including commercial, industrial, and office, are also required to comply with SCAQMD's or AVAQMD's Rule 402 to prevent public nuisances. While these odors would be required to be controlled, additional measures may be warranted to prevent a nuisance, depending on the nature of the proposed use. Consequently, industrial land uses associated with the buildout of the Proposed Project may generate odors that affect a substantial number of people.

- Construction activities would require the operation of equipment that may generate exhaust from either gasoline or diesel fuel. Construction and development would also require the application of paints and the paving of roads, which could generate odors. These types and concentrations of odors are typical of developments and are not considered significant air quality impacts.

SCAQMD and AVAQMD Rule 402, Nuisance, requires abatement of any nuisance generated by an odor complaint. Because existing sources of odors are required to comply with SCAQMD's or AVAQMD Rule 402, impacts to siting of new sensitive land uses would be less than significant. Future environmental review for major sources of odors are required to ensure that sensitive land uses are not exposed to nuisance odors. Rule 402 requires abatement of any nuisance generating an odor complaint. However, additional measures may be necessary to prevent an odor nuisance. Therefore, industrial land uses allowed by the Proposed Project may generate a potentially significant odor impact to a substantial number of people.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

AQ-4 If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County's regulations. Facilities that have the potential to generate nuisance odors include but are not limited to:

- Wastewater treatment plants
- Composting, greenwaste, or recycling facilities

- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR.These changes are identified in the form of the mitigation measure above. The County hereby finds that implementation of the mitigation measure is feasible, and the measure is therefore adopted.

2. Cultural Resources

Impact 5.5-2:	Buildout of the Proposed Project could destroy archaeological or paleontological resources or a unique geologic feature.

Support for this environmental impact conclusion is fully discussed starting on page 5.5-19 of Section 5.5, *Cultural Resources*, of the DEIR.

Facts in Support of Finding:

Development of projects pursuant to the Proposed Project could impact known and unknown archaeological sites. As stated above, locations of archaeological sites and types of resources in each site are kept confidential due to their sensitive nature. The Project Area is considered potentially sensitive for archaeological resources. Thus, ground disturbance has a high potential for uncovering archaeological resources.

Ground disturbance from development projects pursuant to the Proposed Project could damage fossils buried in soils. The Project Area is not an area where significant fossil localities have been found; however, fossils continue to be discovered in the County in association with ground-disturbing activities, particularly in fossil-rich areas. Therefore, the Project Area contains potentially significant, nonrenewable, paleontological resources.

Implementation of the Proposed Project has the potential to impact archeological and paleontological resources. However, existing federal, state, and local regulations require: the provision of studies to identify archaeological and paleontological resources; application review for projects that would potentially involve land disturbance; project-level standard conditions of approval that address unanticipated archaeological and or paleontological discoveries; and

development of specific mitigation measures if resources are encountered during any development activity.

Review and protection of archaeological and paleontological resources is also afforded by CEQA for individual projects subject to discretionary actions that are implemented in accordance with the preferred land use plan. Per section 21083.2 of CEQA, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the EIR shall address the issue of those resources. There is potential to uncover undiscovered archeological and paleontological resources. In the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, a qualified archaeologist would assess the find and develop a course of action to preserve the find, as indicated in Mitigation Measures CUL-2 and CUL-3.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

CUL-2 Prior to the issuance of any grading permit associated with a discretionary project, applicants shall provide written evidence to the County of Los Angeles that a County-approved archaeologist has been retained to observe grading activities greater than three feet in depth and to salvage and curate archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference; shall establish procedures for archaeological resource surveillance and monitoring; shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate; and shall obtain a commitment from an American Association of Museums accredited repository for the storage of any recovered significant archaeological remains.

If the archaeological resources are found to be significant, the archaeologist shall determine appropriate actions, in cooperation with the project applicant and the County, for exploration and/or salvage. Any recovered significant archaeological resources shall be permanently transferred to an appropriate repository, subject to the fees and conditions of acceptance as established by the repository in their repository agreement. Prior to the release of the grading bond, the applicant shall submit a report prepared by the archaeologist that identifies the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis, if required by mitigation measures. These actions, as well as final mitigation and disposition of the resources shall be subject to the approval of the County.

CUL-3 Prior to the issuance of any grading permit associated with a discretionary project, applicants shall provide written evidence to the County of Los Angeles that a County-approved paleontologist has been retained to observe grading activities greater than three feet in depth and to salvage and curate paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference; shall establish procedures for paleontologist resource surveillance and monitoring; shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate; and shall obtain a

commitment from an American Association of Museums accredited repository for the storage of any recovered significant paleontological remains.

If the paleontological resources are found to be significant, the paleontologist shall determine appropriate actions, in cooperation with the project applicant and the County, for exploration and/or salvage. Any recovered significant paleontological resources shall be permanently transferred to an appropriate repository, subject to the fees and conditions of acceptance as established by the repository in their repository agreement. Prior to the release of the grading bond, the applicant shall obtain approval of the paleontologist's report, from the County. The report shall include the period of inspection, an analysis of any fossils found and the present repository of the fossils. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis, if required by mitigation measures. These actions, as well as final mitigation and disposition of the resources shall be subject to the approval of the County.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County hereby finds that implementation of the mitigation measures is feasible, and the measure is therefore adopted.

3. Public Services

Impact 5.14-1:	Buildout of the Proposed Project would introduce new structures, residents, and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel.

Support for this environmental impact conclusion is fully discussed starting on page 5.14-8 of Section 5.14, *Public Services*, of the DEIR.

Facts in Support of Finding:

The Proposed Project provides land use designations that would increase population and housing within the Project Area. The population and housing increase projected under the Proposed Project would increase the demands on LACoFD to provide fire protection and emergency services. To maintain or achieve acceptable travel time standards for fire protection, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. Existing County policies and regulations and Proposed Project goals and policies are intended to reduce impacts associated with fire protection facilities. Specifically, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment. As new development occurs, fees will be collected to ensure adequate levels of service for fire protection are maintained. Therefore, the Proposed Project is not anticipated to result in a potentially significant impact to fire protection or emergency services with construction or expansion of fire protection facilities and compliance with the mitigation measures listed below.

It should be noted that the Proposed Project land use changes do not allow more development to occur in VHFHSZs or more remote and rural areas that could be exposed to higher risks of fire hazards. The Proposed Project significantly reduces allowable development in the Project Area as

compared to the Adopted Area Plan, which reflected suburban-level development across the Antelope Valley, and instead, directs growth to three designated EOAs.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR, and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

PS-1 Prior to issuance of building permits, future project applicants/developers shall pay the LACoFD Developer Fee in effect at that time.

PS-2 Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code. The required fire apparatus road and water requirements shall be in place prior to construction.

PS-3 Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code, and approved by LACoFD prior to building permit issuance.

Finding 1:

Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the DEIR. These changes are identified in the form of the mitigation measures above. The County hereby finds that implementation of the mitigation measures is feasible, and the measure is therefore adopted.

4. Recreation

No potentially significant impacts related to population and housing were identified.

5. Transportation and Traffic

All impacts related to transportation and traffic were identified as either less than significant before mitigation or significant and unavoidable after mitigation.

6. Utilities and Service Systems

All impacts related to transportation and traffic were identified as either less than significant before mitigation or significant and unavoidable after mitigation.

C. SIGNIFICANT UNAVOIDABLE IMPACTS

The following summary describes the unavoidable adverse impact of the proposed project where either mitigation measures were found to be infeasible, or mitigation would lessen impacts to less than significant. The following impact would remain significant and unavoidable:

1. Agriculture and Forestry Resources

Impact 5.2-1:	Buildout of the Proposed Project would convert California resource agency–designated farmland to non-agricultural land uses.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-13 of Section 5.2, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Proposed land use designations on Important Farmland under the Proposed Area Plan are listed in Table 5.2-3 of the DEIR and shown on Figure 5.2-4, *Proposed Land Use Designations on Important Farmland*, of the DEIR. Two of the proposed designations, RL10 (Rural Land, one dwelling unit per 10 gross acres) and RL20 (Rural Land, one dwelling unit per 20 gross acres) are considered compatible with continued intensive commercial agriculture. All other land use designations are considered incompatible with continued agricultural use because the designations either permit residential use at one or more dwelling units per five acres; or permit other types of land uses incompatible with agriculture. It is assumed here that all of the mapped Important Farmland in designations incompatible with continued agricultural use would be converted to non-agricultural uses by buildout of the Proposed Area Plan. Such mapped farmland consists of 5,968 acres of Prime Farmland, 133 acres of Farmland of Statewide Importance, and 68 acres of Unique Farmland, totaling 6,169 acres; that is, approximately 26 percent of the total of mapped Important Farmland in the Project Area. Farmland that would be converted to non-agricultural use is about 16 percent of the total of 38,862 acres of such farmland countywide (including incorporated and unincorporated areas), such loss of mapped important farmland would be a significant impact.

Implementation of proposed ARA policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to non-agricultural uses. However, ARAs would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Therefore, conversion of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland to non-agricultural uses due to buildout of the Proposed Project would be a potentially significant impact.

Mitigation Measures:

No mitigation measures are available that would reduce impacts of conversion of mapped Important Farmland to less than significant. Efforts to preserve offsite farmland through agricultural or conservation easements, or mitigation banks, do not offset or decrease the reduction in total mapped Important Farmland due to implementation of a project. The proposed ARA program and related policies in the Proposed General Plan Update (Policies C/NR 8.1 through C/NR 8.3) would encourage the continued use of farmland for agricultural operation. However, the ARAs would not be agricultural preserves and would not guarantee the preservation of farmland. Impacts would be significant and unavoidable.

The California Court of Appeal has held that a mitigation measure requiring an agricultural land mitigation bank does not actually avoid or reduce the loss of farmland subject to development (*Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956). Therefore, an Agricultural Land Mitigation Bank is not a valid form of mitigation for farmland conversion impacts. Since then, two other California appellate courts have issued conflicting rulings on whether preservation of offsite farmland mitigates conversion of farmland on a project site to non-agricultural uses. The three rulings are unpublished and are not legal precedents, but do include arguments that might be used in future legislation or court opinions on this topic. One of the rulings, *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) by

the Sixth District Appellate Court, found that preservation of offsite farmland does not mitigate conversion of farmland by a project because it does not create new farmland or offset the loss of farmland due to the project. The other ruling, *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) by the Third District Court, disagreed with the earlier two rulings. The last ruling stated that conservation fees can mitigate for the loss of agricultural lands by diminishing development pressures due to the conversion of farmland and reducing the domino effect created by projects. The question of whether offsite preservation of farmland mitigates conversion of farmland to non-agricultural uses has yet to be settled by the courts or the legislature.

As most of Los Angeles County is 1) urbanized, 2) mountainous terrain unsuitable for intensive commercial agriculture, or 3) land with other constraints that make commercial agriculture infeasible (such as lack of water supply or lack of soil suitability), use of such mitigation would require acquisition of land outside of Los Angeles County. Therefore, mitigation banks and similar programs designed to offset the loss of agricultural land are considered infeasible.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.2-5:	Buildout of the Proposed Project would involve other changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forest land to nonforest use.

Support for this environmental impact conclusion is fully discussed starting on page 5.2-21 of Section 5.17, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

Agricultural use can be incompatible with some other land uses–such as residential, school, hospital, and day care uses–due to pesticide use, noise, dust emissions, and odors. As mapped Important Farmland in the Project Area is generally scattered, buildout of the Proposed Project would involve development of non-agricultural uses along many edges of Important Farmland areas, as well as within some Important Farmland areas. New nonagricultural uses may develop around existing agricultural uses, creating pressure for them to be converted to nonagricultural uses.

Most of the areas of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland within the Project Area are in and surrounded by proposed land use designations incompatible with agricultural use. Thus, buildout of land surrounding existing mapped Important Farmland within the Project Area under the Proposed Area Plan would contribute to pressure to convert mapped farmland to non-agricultural uses.

Increasing water demands in a region can reduce the practicability and/or economic feasibility of commercial agriculture. The two foremost sources of water in the Antelope Valley are local groundwater and water imported from Northern California via the State Water Project (SWP). The

Antelope Valley–East Kern Water Agency (AVEK), the largest water wholesaler in the Antelope Valley region, purchases imported water and resells it to local water providers. The native safe yield of the Antelope Valley Groundwater Basin is 82,300 acre-feet per year (afy). The SWP water brought in the Antelope Valley results in return flows. The supplemental yield from imported water return flows and the native safe yield of 82,300 provide an average total of 110,000 afy.

Most of the forest land in the Project Area is either along streams or at the highest elevations of the San Gabriel Mountains. Much forest land along streams is protected under California Fish and Game Code Sections 1600 etseq; forest land high in the San Gabriel Mountains is protected as part of the Angeles National Forest. Implementation of the Proposed Project would not indirectly cause conversion of substantial areas of forest land to non-forest uses.

Implementation of proposed ARA policies would reduce direct and indirect impacts of conversion of mapped Important Farmland to incompatible non-agricultural uses. However, ARAs would not be agricultural preserves, and some conversion of Important Farmland to non-agricultural uses would be permitted in ARAs. Buildout of the Proposed Project would have a significant indirect impact on conversion of mapped Important Farmland to non-agricultural use due to pressure to convert farmland to non-agricultural uses and related incompatibilities between agricultural and urban uses.

Mitigation Measures:

See explanation for Impact 5.2-1, above. No feasible mitigation measures beyond the goals and policies already incorporated into the Proposed Project are feasible to reduce impacts to farmland that would result from implementation of the Proposed Project.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Cumulative Impacts: Agriculture and Forestry Resources

Support for this environmental impact conclusion is fully discussed starting on page 5.2-22 of Section 5.17, *Agriculture and Forestry Resources*, of the DEIR.

Facts in Support of Finding:

The cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes the Project Area, the unincorporated Santa Clarita Valley, and the cities of Lancaster, Palmdale, and Santa Clarita.

Cities of Lancaster and Palmdale

Cumulative projects in Lancaster and Palmdale could cause significant cumulative impacts if they would convert substantial areas of Prime Farmland, Farmland of Statewide Importance, or Unique

Farmland to non-agricultural uses. There are about 6,044 acres of Prime Farmland, 31 acres of Farmland of Statewide Importance, and 47 acres of Unique Farmland in the cities of Lancaster and Palmdale. The total of those three categories, 6,123 acres, is about 20 percent of the total in the subregion.

Santa Clarita Valley

A total of 56,836 acres of farmland and grazing land in unincorporated portions of the Santa Clarita Valley Planning Area were mapped by the Division of Land Resource Protection in 2010, including:

- 1,039 acres of Prime Farmland
- 181 acres of Farmland of Statewide Importance
- 264 acres of Unique Farmland
- 130 acres of Farmland of Local Importance
- 55,222 acres of Grazing Land (DLRP 2010).

Important Farmland would be converted to non-agricultural land uses by buildout of the Santa Clarita Valley Area Plan.

The following policies relevant to agricultural resources are set forth in the Santa Clarita Valley Area Plan.

- **Policy LU 1.1.7:** Preserve and protect important agricultural resources, including farmland and grazing land, through designating these areas as Rural Land on the Land Use Map where appropriate.

- **Policy CO 10.1.9:** Preserve forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas, and other open space that provides nature carbon sequestration benefits.

The 2012 Certified EIR for the Santa Clarita Valley Area Plan (Impact Sciences, Inc. 2012) concluded that upon implementation of the above policies, impacts related to conversion of agricultural land in the Santa Clarita Valley Planning Area would be less than significant. Because the Proposed Project would not change any land use designations in the Santa Clarita Valley Planning Area, this significance determination is incorporated in this DEIR by reference.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

2. Air Quality

Impact 5.3-1:	The Proposed Project would generate less growth than the Adopted Area Plan; however, it would not be consistent with the SCAQMD's and AVAQMD's air quality management plans because buildout of the Proposed Project would cumulatively contribute to the nonattainment designations of the SoCAB and MDAB.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-24 of Section 5.3, *Air Quality*,of the DEIR.

Facts in Support of Finding:

The following describes potential air quality impacts of consistency with the SCAQMD and AVAQMD AQMPs from the implementation of the Proposed Project.

CEQA requires that general plans be evaluated for consistency with the air quality management plan(s). A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the air quality management plan(s). It fulfills the CEQA goal of informing decision makers of the environmental effects of the project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the air quality management plan(s). Only new or amended general plan elements, specific plans, and major projects need to undergo a consistency review. This is because the air quality management plan strategy is based on projections from local general plans. There are two key indicators of consistency:

- **Indicator 1:** Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the AAQS or interim emission reductions in the AQMP.

- **Indicator 2:** Whether the project would exceed the assumptions in the AQMP. The AQMP strategy is, in part, based on projections from local general plans.

Indicator 1

The SoCAB is designated nonattainment for O_3 (ozone) and $PM_{2.5}$[1] (fine particulate matter) under the California and National AAQS, for PM_{10} under the California AAQS, and for lead (Los Angeles County only) under the National AAQS. The MDAB is designated nonattainment for O_3 and $PM_{2.5}$ under the California and National AAQS. Because the Proposed Project involves long-term growth associated with buildout of the Proposed Area Plan, cumulative emissions generated by construction and operation of individual development projects would exceed the SCAQMD and AVAQMD regional thresholds (see Impact 5.2-2 and Impact 5.2-3). Consequently, emissions generated by development projects in addition to existing sources within the Project Area are considered to cumulatively contribute to the nonattainment designations of the SoCAB and MDAB. Buildout of the Proposed Project would therefore contribute to an increase in frequency or severity of air quality violations and delay attainment of the AAQS or interim emission reductions in the AQMP, and emissions generated from buildout of the Proposed Project would result in a significant air quality impact. Thus, the Proposed Project would not be consistent with the AQMPs under the first indicator.

[1] *CARB approved the SCAQMD's request to redesignate the SoCAB from serious nonattainment for PM_{10} to attainment for PM_{10} under the National AAQS on March 25, 2010 because the SoCAB did not violated federal 24-hour PM_{10} standards during the period from 2004 to 2007. However, the EPA has not yet approved this request.*

Indicator 2

AVAQMD and SCAQMD consider a project consistent with the air quality management plan if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments, and similar land use plan changes that do not increase dwelling unit density, vehicle trips, or vehicle miles traveled are deemed to not exceed this threshold (SCAQMD 1993; AVAQMD 2011). SCAG projections for the Project Area are partially based on the Adopted Area Plan within the 2012 RTP/SCS. The horizon year for the 2012 RTP/SCS is 2035. Table 5.3-10 compares the population, employment, and daily VMT generation of the Proposed Project compared to the population, employment, and daily VMT generation of the Adopted Area Plan, which is used for regional air quality management planning. As shown in Table 5.3-10, *Comparison of Population, Employment, and VMT Forecasts*, in the DEIR, buildout of the Proposed Project would result in a lower population and generate more employment for the Project Area than SCAG forecasts. Overall, the "service population" (residents plus employees) of the Project Area and its associated VMT would be lower under the Proposed Project.

As shown in the table, the Proposed Project would result in overall less growth compared to the Adopted Area Plan. Thus, the Proposed Project would be consistent with the AQMPs under this indicator as it would not exceed the forecasts assumed in the plans.

Summary

As described above, the Proposed Projectwould result in less overall growth and VMT generated compared to the Adopted Area Plan. Thus, emissions associated with the Project Area would already be accounted for in the current regional emissions inventories for the SoCAB and MDAB. However, buildout of the Proposed Project would exceed the SCAQMD and AVAQMD thresholds and cumulatively contribute to the nonattainment designations in the SoCAB and MDAB (Antelope Valley portion). Therefore, the Proposed Project would be considered inconsistent with the SCAQMD's AQMP and AVAQMD's Ozone Attainment Plan, resulting in a significant impact in this regard.

Mitigation Measures:

Mitigation measures incorporated into future development projects and adherence to the Proposed Project policies for operation and construction phases described under Impacts 5.3-2 and 5.3-3 below would reduce criteria air pollutant emissions associated with buildout of the Proposed Project. Goals and policies in the Proposed Project would facilitate continued County participation/cooperation with SCAQMD, AVAQMD, and SCAG to achieve regional air quality improvement goals, promote energy conservation design and development techniques, encourage alternative transportation modes, and implement transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management plans due to the magnitude of growth and associated emissions that would be generated by the buildout of the Project Area in accordance with the Proposed Project.

Finding 3:

Buildout of the Proposed Project would exceed the SCAQMD and AVAQMD significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB and MDAB (Antelope Valley portion). Therefore, the Proposed Project would be inconsistent with SCAQMD's 2012 AQMP and AVAQMD's Ozone Attainment Plan. Mitigation measures incorporated into future development projects and adherence to the Proposed Project policies described in Section 5.3.3 of the DEIR would reduce criteria air pollutant emissions associated with

buildout of the Proposed Project. Goals and policies included in the Proposed Project would facilitate continued County participation/cooperation with SCAQMD, AVAQMD, and SCAG to achieve regional air quality improvement goals, promote energy conservation design and development techniques, encourage alternative transportation modes, and implement transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management plans due to the associated emissions that would be generated by the buildout of the Project Area in accordance with the Proposed Project. Impact 5.3-1 would remain Significant and Unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-2:	Construction activities indirectly associated with the Proposed Area Plan would generate a substantial increase in short-term criteria air pollutant emissions that exceed the SCAQMD and AVAQMD significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-26 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

Air quality emissions related to construction must be addressed on a project-by-project basis. For this broad-based Proposed Project, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of SCAQMD's or AVAQMD's short-term regional or localized construction emissions thresholds. Because of the likely scale and extent of construction activities pursuant to the future development that would be accommodated by the Proposed Project, at least some projects would likely continue to exceed the relevant SCAQMD and AVAQMD thresholds. Consequently, construction-related air quality impacts associated with development in accordance with the Proposed Project are deemed significant.

It should be noted that mass emissions from a project are not correlated with concentrations of air pollutants.Projects that exceed the regional significance threshold contribute to the nonattainment designation. As the attainment designation is based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health, the Proposed Project would cumulatively contribute to health impacts within the SoCAB and Antelope Valley portion of the MDAB. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Particulate matter can also lead to a variety of health effects in people. These include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Regional emissions contribute to these known health effects, but it is speculative for this broad-based Proposed Project to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or how

many additional individuals in the air basin would be affected by the health effects cited above. The SCAQMD and AVAQMD are the primary agencies responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SoCAB and MDAB, respectively. To achieve the health-based standards established by the EPA, SCAQMD and AVAQMD prepare air quality management plans that detail regional programs to attain the AAQS. However, because cumulative development within the Project Area would exceed the regional significance thresholds, the project could contribute to an increase in health effects in the basin until such time as the attainment standard are met in the SoCAB and the Antelope Valley portion of the MDAB.

Mitigation Measures:

AQ-1 If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable air quality management district (AQMD) adopted thresholds of significance, applicants for new development projects shall be required to comply with mitigation measures as identified in the CEQA document prepared for the individual development project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:

- Construction contractors of development projects shall use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. Use of Tier 3 construction equipment shall be included as a note on grading plans submitted to the County.
- Grading plans shall include a note that construction contractors shall ensure construction equipment is properly serviced and maintained to the manufacturer's standards.
- Grading plans shall include a note that, if feasible, construction contractors shall consider use of off-road equipment that is tire-based rather than track-based, which creates more ground disturbance.
- Grading plans shall include a note that construction contractors shall limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Grading plans shall include a note that construction contractors shall water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.
- Grading plans shall include a note that construction contractors shall cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
- Grading plans shall include a note that construction contractors shall pave, apply water three times daily or as often as necessary to control dust, or apply (non-toxic)

soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.

- Grading plans shall include a note that construction contractors shall sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
- Grading plans shall include a note that construction contractors shall sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.
- Grading plans shall include a note that construction contractors shall hydroseed or apply non-toxic soil stabilizers to inactive construction areas (i.e., areas not being actively disturbed for 10 or more days).
- Grading plans shall include a note that construction contractors shall enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- Grading plans shall include a note that construction contractors shall minimize ground disturbance (e.g., vegetation removal and mowing), to the extent feasible.

Finding 3:

Construction activities associated with the buildout of the Proposed Project would generate criteria air pollutant emissions that would exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Mitigation Measure AQ-1 would reduce air pollutant emissions. However, due to the magnitude of emissions generated by future construction activities associated with the buildout of the Proposed Project, no additional mitigation measures are available that would reduce impacts below SCAQMD's and AVAQMD's thresholds. Impact 5.3-2 would remain Significant and Unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-3:	Long-term operation of the Proposed Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-28 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

The following describes potential regional operational air quality impacts in the Proposed Area Plan from implementation of the Proposed Project. It is important to note that, based on the requirements of CEQA, this analysis is based on a comparison of the Proposed Project land use map to existing land uses and not to the existing Adopted Area Plan land use map. It is also important to note that the Proposed Project is a regulatory document that sets up the framework for future growth and development and does not directly result in development in and of itself. Before any development can occur within the Project Area, all such development is required to be analyzed for conformance with the Proposed Area Plan, zoning requirements, and other applicable local and state requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits.

The Proposed Project guides growth and development within the Project Area by designating land uses in the Proposed Project and through implementation of the goals and policies of the Proposed Project. New development would increase air pollutant emissions in the Project Area and contribute to the overall emissions inventory in the SoCAB and Antelope Valley portion of the MDAB. A discussion of health impacts associated with air pollutant emissions generated by operational activities is included in the Air Pollutants of Concern discussion in Section 5.3.1, *Environmental Setting,* of the DEIR.

Proposed Project Buildout

The increase in criteria air pollutant emissions for the full buildout scenario is based on the difference between existing land uses and land uses associated with buildout of the Proposed Project. Buildout of the Proposed Project is not linked to any development timeframe. The timeframe of buildout would extend far beyond the 2035 horizon year used to forecast travel characteristics. Table 5.3-11, *Antelope Valley Area Plan Criteria Air Pollutant Emissions Buildout Forecast – Daily Emissions*, of the DEIR and Table 5.3-12, *Antelope Valley Area Plan Criteria Air Pollutant Emissions Buildout Forecast – Annual Emissions*, of the DEIR shows a forecast of the Antelope Valley Area Plan criteria air pollutant emissions inventory at buildout compared to the daily and annual emissions thresholds, respectively. The majority of new growth would occur in the MDAB.[2]

As shown in Table 5.3-11 of the DEIR, buildout of the Proposed Project would generate long-term emissions that exceed the daily SCAQMD thresholds for the all the criteria air pollutants. Similarly, as shown in Table 5.3-12 of the DEIR, except for SO_2, the annual AVAQMD thresholds for all criteria pollutants would also be exceeded. The MDAB is currently designated nonattainment for O_3 and particulate matter ($PM_{2.5}$). The SoCAB is designated nonattainment for O_3 and $PM_{2.5}$, under the California and National AAQS, PM_{10} under the California AAQS, and lead (Los Angeles County only) under the National AAQS.[3]Emissions of VOC and NO_x are precursors to the formation of O_3. In addition, NO_x is a precursor to the formation of particulate matter (PM_{10} and $PM_{2.5}$). Thus, the Proposed Project would cumulatively contribute to the existing nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Implementation of the Proposed Project goals and policies (see Section 5.3.3, *Relevant Area Plan Goals and Policies*) would reduce air quality impacts to

[2] *A portion of the new growth planned in the northwestern portion of the Project Area in the West Economic Opportunity Area is located within the SoCAB.*

[3] *CARB approved the SCAQMD's request to redesignate the SoCAB from serious nonattainment for PM_{10} to attainment for PM_{10} under the national AAQS on March 25, 2010, because the SoCAB has not violated federal 24-hour PM_{10} standards during the period from 2004 to 2007. In June 2013, the EPA approved the State of California's request to redesignate the South Coast PM_{10} nonattainment area to attainment of the PM_{10} National AAQS, effective on July 26, 2013.*

the extent feasible. For example, Policies LU 5.1, LU 5.2, M 1.1, M 2.2, M 2.3, M 7.3, and M 9.2 would contribute to a reduction in vehicle trips. However, operational phase-related air quality impacts associated with future development under the Proposed Project would be significant.

It should be noted that mass emissions from a project are not correlated with concentrations of air pollutants. Projects that exceed the regional significance threshold contribute to the nonattainment designation. As the attainment designation is based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health, the Proposed Project would cumulatively contribute to health impacts within the SoCAB and MDAB. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Particulate matter can also lead to a variety of health effects in people. These include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Regional emissions contribute to these known health effects but it is speculative for this broad-based Proposed Project to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment, since mass emissions are not correlated with concentrations of emissions, or how many additional individuals in the air basin would be affected by the health effects cited above. The SCAQMD and AVAQMD are the primary agencies responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SoCAB and MDAB, respectively. To achieve the health-based standards established by the EPA, SCAQMD and AVAQMD prepare air quality management plans that detail regional programs to attain the AAQS. However, because cumulative development within the Project Area would generate emissions that exceed the regional significance thresholds, the Proposed Project could contribute to an increase in health effects in the basin until such time as the attainment standard are met in the SoCAB and the MDAB.

Mitigation Measures:

Goals and policies are included in the Proposed Project that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by the buildout of residential, office, commercial, industrial, and warehousing land uses in the Project Area, no mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds.

Finding 3:

Buildout of the proposed land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Goals and policies are included in the Proposed Project that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by the buildout of the Proposed Project, no mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds. Impact 5.3-3 would remain Significant and Unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.3-4:	Buildout of the Proposed Project could result in new sources of criteria air pollutant emissions and/or toxic air contaminants proximate to existing or planned sensitive receptors.

Support for this environmental impact conclusion is fully discussed starting on page 5.3-31 of Section 5.3, *Air Quality*, of the DEIR.

Facts in Support of Finding:

The following describes potential localized operational air quality impacts in the Project Area from the implementation of the Proposed Project.

Operation of new land uses, consistent with the land use plan of the Proposed Project, would generate new sources of criteria air pollutants and TACs.

Localized Significance Thresholds

SCAQMD and AVAQMD consider projects that cause or contribute to an exceedance of the California or National AAQS to result in significant impacts. Information regarding specific development projects, soil types, and the locations of receptors would be needed to quantify the level of impact associated with future development projects. Due to the scale of development activity associated with the theoretical buildout of the Proposed Project, emissions could exceed the SCAQMD and AVAQMD regional significance thresholds and therefore, in accordance with the SCAQMD and AVAQMD methodology, may result in significant localized impacts. Air quality emissions would be addressed on a project-by-project basis. For this broad-based Proposed Area Plan, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of localized emissions thresholds. Nevertheless, because of the likely scale of future development that would be accommodated by the Proposed Project, at least some projects would likely exceed the AAQS.

Toxic Air Contaminants (TACs)

Operation of new land uses, consistent with the Proposed Project, could also generate new sources of TACs within the Project Area from various industrial and commercial processes (e.g., manufacturing, dry cleaning). Stationary sources used as emergency power supply to communication equipment could also generate new sources of TACsand particulate matter (PM_{10}, $PM_{2.5}$, and UFP). Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD or AVAQMD include industrial land uses, such as chemical processing facilities, dry cleaners, and gasoline-dispensing facilities. In Los Angeles County, operators of certain types of facilities must submit emissions inventories. The Air Toxics Program categorizes each facility as being high, intermediate, or low priority based on the potency, toxicity, quantity, and volume of its emissions. If the risks are above established levels, facilities are required to notify surrounding populations and to develop and implement a risk reduction plan. In addition, the County Department of Public Health has a significant proactive role in working with regulatory agencies to address these potential hot spots.

In addition to stationary/area sources of TACs, warehousing operations could generate a substantial amount of diesel particulate matter emissions from off-road equipment use and truck idling. New land uses in the Project Area that generate trucks trips (including trucks with transport refrigeration units) could generate an increase in DPM that would contribute to cancer and noncancer health risk in the SoCAB or Antelope Valley portion of the MDAB. These new land uses could be near existing sensitive receptors within the Project Area.

Stationary sources of emissions would be controlled by SCAQMD or AVAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD's or AVAQMD's New Source Review, as described above. In addition, AVAQMD identifies the following project types (and associated buffer distance) that would require further evaluation to ensure that sensitive receptors would not be exposed to substantial pollutant concentrations:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

Because the nature of those emissions cannot be determined at this time and they are subject to further regulation and permitting, they will not be addressed further in this analysis, but are considered a potentially significant impact of the Proposed Project.

Mitigation Measures:

AQ-2 New industrial or warehousing land uses that: 1) have the potential to generate 40 or more diesel trucks per day and 2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. When required, the HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable air quality management district. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 μg/m3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) that are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project.

Finding 3:

Buildout of the proposed land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Goals and policies are included in the Proposed Project that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by the buildout of the Proposed Project, no mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds. Impact 5.3-3 would remain Significant and Unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

3. Biological Resources

Impact 5.4-1:	Development of the Proposed Project would impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-76 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Although some direct impacts to special-status species would be mitigated, it does not offset the loss and degradation of sensitive and common habitats inside and outside SEAs that would result from implementation of the Proposed Project. Special-status species are dependent on a variety of habitat types (both common and sensitive), and the conversion of both habitat types with the buildout of the Proposed Project would result in the overall reduction of habitat and resources to support special-status species. Thus, due to the loss and degradation of these habitats, impacts to special-status species remain significant at the Proposed Area Plan level.

Mitigation Measures:

BIO–1 Biological resources shall be analyzed on a project-specific level by a qualified biological consultant. A general survey shall be conducted to characterize the project site, and focused surveys should be conducted as necessary to determine the presence/absence of special-status species (e.g., focused sensitive plant or wildlife surveys). For proposed discretionary projects within SEAs, biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as an analysis of those species with potential to occur onsite).

BIO–2 If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological assessment (as mentioned in Mitigation Measure BIO–1) shall include mitigation measures requiring pre-construction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. If special-status species are found to be nesting, brooding, denning, etc., on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely

relocated to appropriate offsite habitat areas. Relocations into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas should be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.

Finding 3:

Development of the Proposed Project would impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the CDFW or USFWS.

The expanded SEAs within the Project Area are critical to minimizing direct impacts to special-status species by designating larger areas to ensure connectivity between undisturbed habitat areas and around disturbed areas. The process for development within SEAs provides review to ensure that individual projects have identified important resources, and are designed to minimize or mitigate for any impacts. However, there is no mitigation for the direct and indirect impacts to special-status species through the loss of sensitive and common habitats (see Section 5.4 of the DEIR for a list of impacted species). Special-status species are dependent on a variety of habitat types (both common and sensitive), and as SEAs do not in and of themselves prohibit development, the conversion of common habitat types with the buildout of the Proposed Project would result in the overall reduction of habitat and resources to support special-status species. Thus, due to the loss of common habitats capable of supporting special-status species and diminished resource availability, impacts to special-status species and associated habitat remain significant and unavoidable at the Proposed Area Plan level.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.4-2:	Development of the Proposed Project would result in the loss of riparian habitat or sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-80 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

Buildout of the Project Area allowed by the Proposed Project would result in impacts to plant communities, including those recognized by the County and wildlife agencies as sensitive. As a consequence, buildout of the Project Area allowed by the Proposed Project would have a significant adverse effect on sensitive communities.

Mitigation Measures:

Mitigation Measures BIO-1 and BIO-2 apply.

Finding 3:

Development of the Proposed Project would impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the CDFW or USFWS.

Although direct impacts to special-status species would be minimized within SEAs (see Section 5.4 of the DEIR for a list of impacted species), there is no mitigation for the direct and indirect impacts to special-status species through the loss of sensitive and common habitats. Special-status species are dependent on a variety of habitat types (both common and sensitive), and the conversion of common habitat types with the buildout of the Proposed Project would result in the overall reduction of habitat and resources to support special-status species. Thus, due to the loss of common habitats capable of supporting special-status species and diminished resource availability, impacts to special-status species and associated habitat remain significant and unavoidable at the Proposed Area Plan level.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.4-4:	Development of the Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery.

Support for this environmental impact conclusion is fully discussed starting on page 5.4-84 of Section 5.4, *Biological Resources*, of the DEIR.

Facts in Support of Finding:

All of the regional wildlife linkages in the Project Area are at least partially within one or more SEA. The Proposed Project includes substantial enlargement of the SEAs in the Project Area, from 134,745 acres to 356,773 acres, which will expand the land area within identified wildlife corridors under protection. However, the SEAs do not guarantee preservation, nor do they protect all wildlife corridors that occur in the Project Area.

Implementation of the conservation policies of the Proposed Project will have direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement by minimizing impacts to the most biologically sensitive areas.

However, the buildout of the Proposed Project will impact regional wildlife linkages and may impact nursery sites. Thus, buildout of the Proposed Project will have a significant adverse effect on wildlife movement and nursery sites.

Mitigation measure BIO–1 would ensure that, on a project-specific level, a biological resources assessment is prepared to analyze project-specific impacts, including impacts to wildlife movement and nursery sites, and propose appropriate mitigation measures to offset those impacts. Such a survey will give the County the ability to monitor potential reductions in connectivity between core habitats. Any projects within an SEA will be subject to the existing SEA ordinance and review by SEATAC.

Mitigation measure BIO–1 may provide some protection measures to avoid or minimize impacts to wildlife corridors and nursery sites; however, for those projects where avoidance or minimization of impacts is infeasible, the policies proposed in the Proposed Project do not provide for mitigation for loss of wildlife movement opportunities or nursery sites. If development impacts regional wildlife linkages and impedes wildlife movement, connectivity will be lost on a regional scale in these vital landscape corridors and linkages. Thus, impacts to wildlife movement remain significant at the Proposed Area Plan level.

Mitigation Measures:

BIO–3: Currently, development proposed within SEAs requires a conditional use permit, which provides additional protection to wildlife movement corridors and other sensitive biological resources. Proposed projects are requested to be designed so that wildlife movement corridors are left in an undisturbed and natural state. In practice, this protection typically involves adopting appropriate buffers around sensitive resources and setting aside undisturbed areas. However, no feasible mitigation measures are available that would reduce impacts to wildlife movement entirely.

Finding 3:

The Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species,conflict with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Implementation of the Proposed Project will have both direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. However, buildout of the Project will impact regional wildlife linkages and may impact nursery sites. Thus, buildout of the Project Area allowed by the Proposed Project will have a significant adverse effect on wildlife movement and nursery sites.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

4. Cultural Resources

Impact 5.5-1: Development pursuant to the Proposed Project could impact historic resources.

Support for this environmental impact conclusion is fully discussed starting on page 5.5-18 of Section 5.5, *Cultural Resources*, of the DEIR.

Facts in Support of Finding:

Seven historic resources are located within the Project Area. Implementation of the Proposed Project would not directly demolish or materially alter historic resources, since no specific development is proposed at this time. However, identified historic structures and sites that are eligible or potentially eligible for National Register of Historic Resources listing may be vulnerable to development activities in accordance with the Proposed Project. For example, redevelopment to enable a different or more intensive use of a site could result in the demolition of historic or potentially historic structures. Additionally, infrastructure or other improvements could result in damage to or demolition of other historic features. There may also be other potential resources that have not been identified, researched, or evaluated for historical significance as defined in CEQA.

There are a number of federal, state, and local policies, regulations, and institutions in place to protect historical resources. In addition, the Los Angeles County Historical Landmarks and Records Commission reviews and recommends cultural heritage resources in the unincorporated areas, including the Project Area, for inclusion in the State Historic Resources Inventory. Compliance with these regulations and policies would reduce impacts to historical resources.

Project-level environmental compliance procedures would identify existing and potential historic resources that could be affected by a proposed project and encourage the avoidance of known historic resources to the extent feasible through project siting and design. When impacts to historic resources cannot be avoided, use of the Secretary of the Interior's Standards would be expected to mitigate impacts to a less than significant level. Implementation of the Proposed Project would not itself demolish or materially alter historic resources. Title 22 of the County Code and state and federal regulations restricting alteration, relocation, and demolition of historical resources ensure impacts would be avoided to the extent possible. In addition, the County's Department of Regional Planning has worked with the Historical Landmarks and Records Commission (Landmarks Commission) and the Regional Planning Commission to draft a comprehensive historic preservation ordinance for the unincorporated areas of Los Angeles County. The ordinance was discussed by the Landmarks Commission on September 26, 2014, and recommended for approval by the Regional Planning Commission on October 15, 2014. The ordinance is scheduled for consideration by the County Board of Supervisors in November 2014. A historic preservation ordinance is local legislation that seeks to preserve, conserve and protect buildings, objects, landscapes, or other artifacts of historical and cultural significance.

However, the above policies afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility will occur on a case-by-case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the Proposed Project. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur in the future. This is considered a potentially significant impact prior to mitigation.

Mitigation Measures:

CUL-1 If, during any subsequent project-level review and prior to development, activities that would demolish or otherwise physically alter buildings, structures, or features of an officially listed historic or cultural resource; or historic buildings, structures, or features officially determined eligible for designation as a historic or cultural resource, a cultural resource professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History shall be retained by the project applicant, at the discretion of the County, to determine if the project would cause a substantial adverse change in the significance of a historical resource. The results of the investigation shall be documented in a technical report or memorandum that identifies and evaluates any historical resources within the improvements area and includes recommendations and methods for eliminating or reducing impacts on historical resources. Methods may include, but are not limited to, written and photographic recordation of the resource in accordance with the level of Historic American Building Survey (HABS) documentation that is appropriate to the significance (local, state, national) of the resource.

Finding 3:

The federal, state, and local regulations stated above afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility would occur on a case-by-case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the Proposed Project. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

5. Greenhouse Gas Emissions

Impact 5.7-1:	Buildout of the Proposed Project would result in a substantial increase in GHG emissions compared to existing conditions and would also not meet the long-term GHG reduction goal under Executive Order S-03-05.

Support for this environmental impact conclusion is fully discussed starting on page 5.7-24 of Section 5.7, *Greenhouse Gas Emissions*, of the DEIR.

Facts in Support of Finding:

Development under the Proposed Project would contribute to global climate change through direct and indirect emissions of GHG from land uses within the Project Area.

Proposed Area Plan

The increase in GHG emissions is based on the difference between existing land uses and land uses associated with theoretical buildout of the Proposed Project.The community-wide GHG emissions inventory for the Project Area at buildout (post-2035) compared to existing conditions is included in Table 5.7-6, *Buildout GHG Emissions Inventory Antelope Valley Area Plan*, of the DEIR. The buildout inventory includes reductions from federal and state measures identified in CARB's Scoping Plan, including the Pavley fuel efficiency standards (see Section 5.7of the DEIR for a full description of regulatory standards), and LCFS for fuel use (transportation and off-road). In addition, it is likely that new federal and state programs would be adopted, resulting in further GHG reductions post-2035.

As shown in Table 5.7-6 of the DEIR, the net increase in GHG emissions of 2,068,101 metric tons of carbon dioxide equivalent ($MTCO_2e$) from operational activities associated with buildout within the Project Area under the Proposed Project, would exceed SCAQMD's draft bright-line screening threshold of 3,000 $MTCO_2e$ for all land use types in addition to the AVAQMD's threshold of 90,718 $MTCO_2e$ (100,000 tons). The increase in overall land uses within the specific plan boundary is the primary factor for the increase in overall GHG emissions. Under the Proposed Project, total service population would increase by 328 percent over existing conditions. In addition to the operation phase emissions, construction of new developments accommodated by the Proposed Project would further increase the overall net emissions inventory.

Although the Proposed Project would result in a substantial increase in GHG emissions in the Project Area, it would also result in a 19 percent decrease in GHG emissions per person. The GHG emissions per capita rate would decrease from 6.65 $MTCO_2e$/year/service population (SP) to 5.40 $MTCO_2e$/year/SP. However, although buildout of the Project Area allowed by the Proposed Project would result in a slight decrease in GHG emissions per capita, it would not meet the SCAQMD Year 2035 Target efficiency metric of 4.0 $MTCO_2e$/year/SP or the target identified in Executive Order S-03-05, which would equate to 1.3 $MTCO_2e$/SP by 2050. Additional state and local actions are necessary to achieve the post-2020 GHG reduction goals for the State. CARB has released an update to the 2008 Scoping Plan to identify a path for the State to achieve additional GHG reductions. However, at this time, no additional GHG reductions programs have been outlined that get the State to the post-2020 targets identified in Executive Order S-03-05, which are an 80 percent reduction in 1990 emissions by 2050. As identified by the California Council on Science and Technology, the State cannot meet the 2050 goal without major advances in technology (CCST 2012). Therefore, the Project's cumulative contribution to the long-term GHG emissions in the state would be considered substantial and potentially significant.

Mitigation Measures:

GHG-1 The County of Los Angeles shall include the following implementation actions in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05.

The County shall further research to determine the feasibility, and as appropriate propose amendments to the County Code, for the following:

- Require new residential and nonresidential buildings within the Antelope Valley Area Plan to achieve the Tier 1 energy standards within California Green Building

Standards Code (Title 24, Part 11). The voluntary Tier 1 CALGreen requires a 15 percent increase in energy efficiency compared to the Building and Energy Efficiency Standards (Title 24, Part 6). Architectural building plans shall be submitted to the County that identify features that achieve the Tier 1 energy standards (corresponding CCAP Measure BE-1).

- Require that new residential and non-residential building be constructed to accommodate roof-top solar installation. Architectural building plans shall be submitted to the County shall identify this requirement (corresponding CCAP Measure BE-3).

- Prior to issuance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall identify bicycle end-trip facilities, including bike parking and lockers. The location of the bicycle storage shall be specified on site plans and verified by Department of Regional Planning prior to building permit issuance (corresponding CCAP Measure LUT-1).

- Require installation of Level 2 (240 volt) electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) within the Antelope Valley Area Plan and ensure that at least one-third of these charging stations will be available for visitor use (corresponding CCAP Measure LUT-8).

GHG-2 The County of Los Angeles shall include the following additional implementation actions in the Antelope Valley Area Plan Implementation Plan (Chapter 8) to ensure progress toward meeting the long-term GHG reduction goals of Executive Order S-03-05:

The County shall further research to determine the feasibility, and as appropriate propose amendments to the County Code, for the following:

- Prior to issuance of building permits for new construction of residential development, the property owner/developer shall indicate on plans that garage and/or car port parking are electrically wired to accommodate a Level 2 (240 volt) EV charging. The location of the electrical outlets shall be specified on building plans, and proper installation shall be verified by Department of Public Works prior to issuance of a Certificate of Occupancy.

- Prior to issuance of building permits for new construction of non-residential development of 100,000 building square feet or more within the Antelope Valley Area Plan, the applicant shall indicate on plans that at minimum, 10 Level 2 EV vehicle charging stations will be provided for public use. The location of the EV station(s) shall be specified on building plans, and proper installation shall be verified by the Department of Public Works prior to issuance of a Certificate of Occupancy.

- The County of Los Angeles shall require applicants of new residential developments to consider installation of gray water systems for resident use.

- The County of Los Angeles shall require applicants of non-residential developments of 100,000 building square feet or more, to coordinate with the Antelope Valley Transit Authority for the installation of additional bus shelters and transit stops as feasible.

Finding 3:

The goals and policies of the Proposed Project in addition to Mitigation Measures GHG-1 and GHG-2 would ensure that GHG emissions from buildout of the Proposed Project would be minimized. However, additional statewide measures would be necessary to reduce GHG emissions under the Proposed Project to meet the long-term GHG reduction goals under Executive Order S-03-05, which identified a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. CARB is currently updating the Scoping Plan to identify additional measures to achieve the long-term GHG reduction targets. At this time, there is no plan past 2020 that achieves the long-term GHG reduction goal established under S-03-05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology (CCST 2012). Since no additional statewide measures are currently available, Impact 5.7-1 would remain significant and unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

6. Mineral Resources

Impact 5.11-1:	Development in accordance with the Proposed Project would cause the loss of availability of known mineral resources in the Project Area.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-43 of Section 5.11, *Mineral Resources*, of the DEIR.

Facts in Support of Finding:

Buildout of the Project Area under the Proposed Project would change land use designations in the areas listed below that are identified as MRZ-2, mineral resource sectors, or active mines. Active aggregate mines are owned and/or controlled by aggregate producers, and are permitted by the County. Thus, changes in land use designations for active mines pursuant to the Proposed Project would not block continued mining at those sites.

Proposed land use designations for areas mapped MRZ-2 are shown in Table 5.11-5 of the DEIR and in Figure 5.11-5 of the DEIR. Note that the total shown is lower than the total mentioned above in *Existing Conditions* (15,882 acres). This is because some of the MRZ-2 area is located in public rights-of-way that would not have land use designations under the Proposed Project.

Three proposed land use designations—RL10, RL20, and IH (Heavy Industrial)—are considered compatible with future mining activities. Although the RL10 and RL20 designations allow residential

uses, they would only allow residential development at extremely low densities, such as homesteads associated with grazing operations.

As shown in Table 5.11-5 of the DEIR, about 85 percent of the MRZ-2 area in the Project Area would be designated for land uses considered compatible with future mining. Both of the active mines in unincorporated area within the Project Area would be designated RL20 under the Proposed Project and are in the Big Rock Wash/Rock Creek area. However, buildout of the Proposed Project would also result in the development of approximately 2,319 acres with land uses considered incompatible with mining, such as commercial, residential, and public uses. This acreage represents about 15 percent of the total MRZ-2 area in the Project Area. Nearly all of the incompatible designations are in the Little Rock Wash area. Availability of those resources would be lost at buildout. Therefore, this impact would be potentially significant.

Mitigation Measures:

No mitigation measures are available that would reduce impacts of Proposed Project buildout to less than significant. Mineral resources are limited, nonrenewable, and cannot be increased elsewhere to compensate for a loss of availability due to buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in the Project Area due to the very high cost of transporting aggregate.

Finding 3:

Future development consistent with the Proposed Project could cause a loss of availability of known mineral resources within the Project Area. No mitigation measures are available that would reduce this impact to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for the loss of availability of mineral resources due to the buildout of the Project Area under the Proposed Project. Compensatory mitigation outside of the region is also infeasible. Such mitigation would not reduce the loss of availability of mineral resources in the Project Area due to the very high cost of transporting aggregate. Impact 5.11-1 would be significant and unavoidable

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Impact 5.11-2: Buildout of the Proposed Project would cause a loss of availability of mineral resources in the Little Rock Wash area, which is designated for mineral extraction in the Adopted Los Angeles County General Plan.

Support for this environmental impact conclusion is fully discussed starting on page 5.11-16 of Section 5.11, *Mineral Resources*, of the DEIR.

Facts in Support of Finding:

For reasons discussed under Impact 5.11-1, above, buildout of the Project Area under the Proposed Project would substantially reduce availability of mineral resources in one mineral extraction area: the Little Rock Wash area. This area is identified as a mineral extraction area in the Adopted Los Angeles Countywide General Plan. However, residential development would be allowed in the area under the Proposed Project and through policies within the Proposed Project, development is focused if this area also falls within an EOA. Residential uses, including very low-density residential uses, are considered incompatible with mining extraction activities. At buildout, residential uses in the area would prevent continued or expanded extraction of minerals. SEAs however, are also designated within this area and can temper conversion of these lands to other uses such as residential. While SEAs do require consideration of the environmental resources on the site, the permitting of mines within the County requires a discretionary permit and therefore is subject to environmental analysis that seeks to identify these same resources. Therefore, while SEAs could help reduce the impacts to locally important mineral resource recovery sites from the conversion to residential, buildout of the Proposed Project would conflict with an adopted land use plan related to locally important mineral resource recovery sites. This impact would be potentially significant.

Mitigation Measures:

No mitigation measures are available that would reduce impacts of Proposed Project buildout to less than significant. Mineral resources are limited, nonrenewable, and cannot be increased elsewhere to compensate for a loss of availability due to buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in the Project Area due to the very high cost of transporting aggregate.

Finding 3:

Buildout of the Project Area allowed by the Proposed Project would cause a substantial loss of availability of mineral resources in one mineral extraction area identified in the Adopted General Plan: the Little Rock Wash area. No mitigation measures are available that would this impact to less than significant. Impact 5.11-2 impact would be significant and unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Cumulative Impacts: Mineral Resources

Support for this environmental impact conclusion is fully discussed starting on page 5.11-19 of Section 5.11, *Mineral Resources*, of the DEIR.

Cumulative projects could cause significant cumulative impacts if they caused a loss of availability of a known mineral resource valuable to the region and/or state or caused a loss of availability of an important mining site delineated in an adopted land use plan. Construction and operation of

cumulative growth identified in Section 4.4, Assumptions Regarding Cumulative Impacts, would have the potential to result in the loss of availability of known mineral resources. Urbanization and growth in the City of Palmdale would potentially result in land uses that are incompatible with mining and resource recovery and would result in a cumulative loss of available resources. Similar to portions of the Project Area, the CGS has classified land within the City of Palmdale and the Santa Clarita Valley as MRZ-2. The Land Use and Environmental Resources Elements of the Palmdale General Plan contain policies aimed at protecting these and other mineral resources. The Santa Clarita Valley Area Plan also contains policies aimed at protecting mineral resources. However, planned and projected growth in the region would result in a reasonably foreseeable loss of mineral resources due to the encroachment of incompatible uses that would limit future areas from being permitted for mining operations. Cumulative impacts would be potentially significant.

Mitigation Measures:

No mitigation measures are available that would reduce impacts of Proposed Project buildout to less than significant. Mineral resources are limited, nonrenewable, and cannot be increased elsewhere to compensate for a loss of availability due to buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible; such mitigation would not reduce the loss of availability of mineral resources in the Project Area due to the very high cost of transporting aggregate.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

7. Noise

Impact 5.12-2:	Buildout of the Proposed Project would result in an increase in traffic on local roadways in Area Plan, which would substantially increase the existing ambient noise environment.

Support for this environmental impact conclusion is fully discussed starting on page 5.12-43 of Section 5.12, *Noise*, of the DEIR.

Facts in Support of Finding:

Future development in accordance with the Proposed Project would cause increases in traffic along some roadways. For the purpose of assessing the compatibility of new development with the anticipated ambient noise, the County utilizes the State's Community Noise and Land Use Compatibility standards; summarized in Table 5.12-5 of the DEIR. Noise-sensitive land uses include residential, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas. Commercial and industrial areas are not considered noise sensitive and have much higher tolerances for exterior noise levels. The "normally unacceptable" minimum noise level for considered noise-sensitive land uses is 70 dBA CNEL. For purposes of this analysis, a significant impact would occur

if project-related traffic increases the ambient noise environment of noise-sensitive locations by 3 dB or more and the ambient noise level under with-project conditions is 70 dBA CNEL or higher (i.e., those with-project conditions that fall within the "Normally Unacceptable" or "Clearly Unacceptable" land use categories). Additionally, a significant impact would also occur if project-related traffic increases the ambient noise environment of noise-sensitive locations by 5 dB or more regardless of the ambient noise level under with-project conditions.

The traffic noise levels were estimated using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (RD-77-108). The FHWA model predicts noise levels through a series of adjustments to a reference sound level. These adjustments account for distances from the roadway, traffic flows, vehicle speeds, car/truck mix, length of exposed roadway, and road width. The distances to the 70, 65, and 60 CNEL contours for selected roadway segments in the vicinity of Proposed Project site are included in Appendix E. Table 5.12-16, *Project Off-Site Contributions: Existing Conditions*, of the DEIR shows the increase in noise levels on roadways if Project traffic would be added to existing traffic conditions, the noise levels are presented at 100 feet from the centerline of each roadway segment provided by the traffic consultant for the project (Fehr and Peers). As seen on Table 5.12-16, sensitive receptors along several roadway segments would be impacted under existing plus project conditions.

Table 5.12-17, *Project Off-Site Contributions: Buildout Conditions*, of the DEIR shows the increase in noise levels on roadways at long-range buildout conditions, the noise levels are presented at 100 feet from the centerline of each roadway segment provided by the traffic consultant for the project (Fehr and Peers).

Buildout of the Proposed Project could result in noise level increases of up to 11.9 dBA. Page 5.12-50 of the DEIR shows roadway segments which have existing nearby noise-sensitive receptors that would experience a substantial increase in noise over existing conditions and would meet the significance criteria.

The existing noise-sensitive receptors along the roadways include single- and multi-family residential land uses in addition to schools and healthcare facilities. Individual projects associated with buildout of the Proposed Project would occur over a period of many years and the increase in noise on an annual basis would not be readily discernable as traffic and noise would increase incrementally.

The Adopted General Plan Noise Element includes goals that would reduce impacts to the extent feasible:

- Reduce transportation noise to a level that does not jeopardize health and welfare
- Minimize noise levels of future transportation facilities
- Establish compatible land use adjacent to transportation facilities
- Allocate noise mitigation costs among those who produce the noise
- Alert the public regarding the potential impact of transportation noise
- Protect areas that are presently quiet from future noise impact

However, cumulative increases in the ambient noise environment along the roadway segments identified from buildout of the area plan would be substantial. Additionally, there are no other reasonably feasible measures to reduce traffic noise impacts to existing uses either due to implementation constraints, aesthetics drawbacks, and/or costs considerations. Therefore, traffic noise impacts to existing noise-sensitive receptors (along the above-noted roadway segments) would experience a substantial increase in noise over existing conditions, would meet the significance criteria, and would be exposed to potentially significant noise levels due to traffic flows.

Mitigation Measures:

Compliance with the County's Noise Element and County Code would reduce traffic noise impacts to existing and proposed noise sensitive uses to the extent feasible. No additional feasible mitigation measures are available to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within Project Area that would be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site traffic noise impacts to existing uses (such as through the construction of sound walls and/or berms) may often be out of proportion with the level of impact.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

8. Transportation and Traffic

Impact 5.16-1:	Buildout in accordance with the Proposed Project would impact levels of service on the existing roadway system.

Support for this environmental impact conclusion is fully discussed starting on page 5.16-43 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

Based on the established significant impact criteria, the Proposed Project would have a significant impact if it causes a roadway segment at level of service (LOS) E or F to experience a change in volume-to-capacity (V/C) of 0.02 or greater. Based on the results of the modeling and impact analysis, numerous locations are forecast to be significantly impacted (see Page 5.16-43 of the DEIR for a list of the locations).

Implementation of the Proposed Project is expected to result in exceeding the County Congestion Management Plan (CMP) standard level of service (LOS E), to LOS F, along with a significant increase in V/C due to the Project, at the following locations:

Existing plus Project

1. Lancaster Road & 300th Street West
2. Avenue D & 60th Street West

2035 plus Project

1. Lancaster Road & 300th Street West

2. Avenue D & 60th Street West

4. Pearblossom Highway (SR-138) & 82nd Street East

Based on the established significant impact criteria, the Proposed Project would have a significant impact if it causes a freeway segment at LOS E or F to experience a change in V/C of 0.02 or greater. Based on the results of the modeling and impact analysis, numerous locations are forecast to be significantly impacted (see Page 5.16-44 of the DEIR for a list of the locations).

Mitigation Measures:

T-1 The County shall continue to monitor potential impacts on roadway segments and intersections on a project-by-project basis as buildout occurs by requiring traffic studies for all projects that could significantly impact traffic and circulation patterns. Future projects shall be evaluated and traffic improvements shall be identified to maintain minimum levels of service in accordance with the County's Traffic Impact Analysis Guidelines, where feasible mitigation is available.

T-2 The County shall implement over time objectives and policies contained within the Antelope Valley Area Plan and the Adopted General Plan Transportation Element. Implementation of those policies will help mitigate any potential impacts of Project growth and/or highway amendments on the transportation system.

T-3 The County shall participate with Metro, the CMP agency in Los Angeles County, on a potential Congestion Mitigation Fee program that would replace the current CMP Debit/Credit approach. Under a countywide fee program, each jurisdiction, including the County, will select and build capital transportation projects, adopt a fee ordinance, collect fees and control revenues. A fee program will require a nexus analysis, and apply only to net new construction on commercial and industrial space and additional residential units and needs to be approved by Metro and the local jurisdictions. A countywide fee, if adopted, will allow the County to mitigate the impacts of development via the payment of the transportation impact fee in lieu of asking each development project for individual mitigation measures, or asking for fair share payments of mitigation. The fee program would itself constitute a "fair-share" program that would apply to all development (of a certain size) within the unincorporated areas.

T-4 The County of Los Angeles shall continue to secure the funding needed to implement the future planned improvements within the Project Area. A variety of funding sources shall be explored, such as Metro's CMP Fee Program as described under T-3, Metro Call for Project funds, and federal and state grant opportunities. If the CMP fee program is not adopted by Metro and the County of Los Angeles, other funding sources for regional transportation needs in the Project Area, including Caltrans facilities, shall be pursued such as a potential North County Development Impact Fee Program, development agreements for large projects, and/or mitigation agreements between future applicants and Caltrans for projects that impact Caltrans facilities.

T-5 The County shall work with Caltrans as they prepare plans to add additional lanes or complete other improvements to various freeways within and adjacent to unincorporated areas. This includes adding or extending mixed flow general purpose lanes, adding or extending existing HOV lanes, adding Express Lanes (high occupancy toll lanes), incorporating truck climbing lanes, improving interchanges and other freeway related improvements.

T-6 The County shall require traffic engineering firms retained to prepare traffic impact studies for future development projects to consult with Caltrans, when a development proposal meets the requirements of statewide, regional, or areawide significance per CEQA Guidelines §15206(b). When preparing traffic impact studies, the most up to date Guide for the Preparation of Traffic Impact Studies from Caltrans shall be followed. Proposed developments meeting the criteria of statewide, regional or areawide include:

- Proposed residential developments of more than 500 dwelling units
- Proposed shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
- Proposed commercial office buildings employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space
- Proposed hotel/motel developments of more than 500 rooms
- When the CEQA criteria of regional significance are not met, Caltrans recommends that Project Applicants consult with Caltrans when a proposed development includes the following characteristics:
- All proposed developments that have the potential to cause a significant impact to state facilities (right-of-way, intersections, interchanges, etc.) and when required mitigation improvements are proposed in the initial study. Mitigation concurrence should be obtained from Caltrans as early as possible.
- Any development that assigns 50 or more trips (passenger car equivalent trips) during peak hours to a state highway/freeway.
- Any development that assigns 10 or more trips (passenger car equivalent trips) during peak hours to an off-ramp. On/off-ramps that are very close to each other in which the project trips may cause congestion on the left-turn lane storage to the on-ramp.
- Any development located adjacent to or within 100 feet of a state highway facility and may require a Caltrans Encroachment Permit. (Exceptions: additions to single family homes or 10 residential units or less).
- When the County cannot determine whether or not Caltrans will expect a traffic impact analysis pursuant to CEQA.

Findings 2 and 3:

The impacted locations are still considered to be significantly impacted with mitigation. Because this is a program-level analysis, additional case-by-case mitigation analysis of impacts and mitigation will occur at the project level to determine more specific physical, program and policy-level mitigation measures to reduce the level of impact below a significant level.

Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements

outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right-of-way without Caltrans' approval). Therefore, Impact 5.16-1 would remain significant and unavoidable.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Cumulative Impacts: Transportation and Traffic

Support for this environmental impact conclusion is fully discussed starting on page 5.16-46 of Section 5.16, *Transportation and Traffic*, of the DEIR.

Facts in Support of Finding:

The geographic scope for traffic analysis includes cumulative growth projections for the County that are reflected in the SCAG RTP/SCS, as described in Section 4.4, *Cumulative Impact Assumptions*, of this DEIR. Past projects in Los Angeles County (cities and unincorporated areas) have converted undeveloped and agricultural land to urban uses, resulting in residential and employment population increases and associated demand for expansions of roadway systems. The contribution of these past projects to area growth is also reflected in the SCAG RTP/SCS. The 2012–2035 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. Safe, secure, and efficient transportation systems will provide improved access to opportunities, such as jobs, education, and healthcare. SCAG utilizes an integrated analytical framework to develop growth projections, travel forecasts, and emissions estimates to support the region's various planning programs. In addition, SCAG maintains a robust subregional modeling and data service program that is essential to the analysis of many of the region's projects and programs.

The primary functions of the Modeling and Forecasting Department include: a) working collaboratively with local jurisdictions to develop socioeconomic growth forecasts as required for regional and local planning; b) providing modeling services for the development and implementation of SCAG's plans, programs, and projects; c) developing and maintaining SCAG's various analytical tools and data to more effectively forecast travel demand and estimate resulting air quality; d) providing member services through a robust subregional modeling and data distribution program; e) promoting state of the art modeling practices; and, f) coordinating modeling activities within the SCAG Region.

To assess the effects of potential land use changes on the transportation system, SCAG's regional travel demand model has been applied as incorporated into the North County Sub-Area Travel Demand Model. The SCAG model covers the six county areas (Los Angeles plus Orange, Ventura, Riverside, San Bernardino and Imperial counties). Within Los Angeles County and the Antelope Valley, the sub-area model includes both city land area and unincorporated areas. Thus, the model is the appropriate tool to test changes in land uses in the unincorporated areas, and to take into account changes and growth in the surrounding city areas of Lancaster and Palmdale. The sub-area model was calibrated to Year 2013 conditions and reflects a 2035 future horizon year. Both models were

used for this analysis. The base year model is used for the "Existing plus Project" analysis for purposes of CEQA review, and the future 2035 model was also reviewed to understand future build out land uses at 2035.

Because the modeling used for the traffic analyses contained in this Section 5.16, *Transportation and Traffic*, incorporates SCAG's regional growth projections, the analyses assess the traffic impacts of all cumulative development reasonably anticipated by Year 2035, and buildout levels of the Proposed Area Plan. As discussed, most intersections and roadway/freeway segments will operate at acceptable levels of service with the planned improvements, although some may require additional improvements, as described in Section 5.16.8, *Mitigation Measures*. It should be noted, however, that it has been anticipated in the traffic analysis that the cumulative impact of the Proposed Project traffic along with other regional growth at the identified freeway locations will be largely mitigated by a combination of regional programs that are the responsibility of other agencies, such as cities and Caltrans. Future developers/project applicants will contribute their fair share to these regional programs, as applicable. However, if these programs are not implemented by the agencies with the responsibility to do so, the cumulative transportation and traffic impacts would remain significant and unavoidable. Under these circumstances, the Proposed Project could result in a cumulatively significant traffic impact that may remain significant and unavoidable.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

9. Utilities and Service Systems

Impact 5.17-3: Water supply and delivery systems are not adequate to meet Proposed Project's requirements in the Project Area beyond 2035.

Support for this environmental impact conclusion is fully discussed starting on page 5.17-29 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

Although four Integrated Regional Water Management (IRWM) Regions serve the Project Area, only the Antelope Valley IRWM contains land use designations that would allow future development.

As a result, the following impact analysis focuses on the ability of the Antelope Valley IRWM to serve the Proposed Project at buildout. Based on a current per capita water consumption factor of 0.223 acre feet per year for the Antelope Valley IRWM, the projected net increase in water demands due to Proposed Project buildout is approximately 69,500 acre feet per year, excluding agricultural demand. It should be noted that future water consumption in the Project Area may be less due to increased use of reclaimed water, and increased water efficiency and conservation required by the recently adopted California Green Building Standards Code.

Table ES-4 in the Antelope Valley IRWM Plan (IRWMP) lists the projects and actions that the Regional Water Management Group and other community participants ("Stakeholders"; see Section 5.17 of the DEIR for a list of participants) believe will help meet the objectives for the region covered by the plan. In total, over 70 projects were submitted for inclusion in the IRWMP, and include implementation projects, plans and studies, and conceptual projects. All projects included in the IRWMP will help the Region to meet its goals and objectives. Implementation projects are programs or construction projects that have had some planning completed, such as facilities planning or cost analyses, and could potentially be implemented in the near future. Finally, conceptual projects are those projects identified by stakeholders that could contribute to meeting the Region's IRWM objectives but may not yet be developed enough to include in the IRWM Plan as an implementation project.

Implementing the IRWM projects will require focused effort, broad community support, political resolve, and funding. The Stakeholders are actively pursuing financial assistance through several grant programs designed to help leverage local investments. The RWMG is also working to establish a secure and long-lasting approach to coordinate resources to meet the growing needs of the entire Antelope Valley Region.

The implementation and conceptual projects proposed will provide additional supply to the Region to supplement the future demand. The IRWM projects identify approximately 30,000 acre-feet per year (AFY) of new supply, while also identifying up to approximately 600,000 AFY of water bank storage capacity. These projects, if implemented, would help the Region to lessen the gap between supply and demand for single-dry and multiple dry year periods.

Mitigation Measures:

USS-1 Support amendments to the County Building Code that would promote upgrades to water and energy efficiency when issuing permits for renovations or additions to existing buildings.

USS-2 Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.

USS-3 Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.

USS-4 Promote energy efficiency and water conservation upgrades to existing non-residential buildings at the time of major remodel or additions.

USS-5 Promote the use of permeable paving materials to allow infiltration of surface water into the water table.

USS-6 Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means, as appropriate.

USS-7 On previously developed sites proposed for major alteration, provide stormwater management improvements to restore natural infiltration, as required by the reviewing authority.

USS-8 Encourage and promote the use of new materials and technology for improved stormwater management, such as pervious paving, green roofs, rain gardens, and vegetated swales.

USS-9 Evaluate development proposals for consistency with the County Green Building Standards Code.

USS-10 Evaluate development proposals for consistency with Low Impact Development Code on development sites, including but not limited to minimizing impervious surface area and promoting infiltration, in order to reduce the flow and velocity of stormwater runoff throughout the watershed.

USS-11 Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval, consistent with County Department of Public Health requirements.

USS-12 Monitor growth, and coordinate with water districts as needed to ensure that long-range needs for potable and reclaimed water will be met.

USS-13 If water supplies are reduced from projected levels due to drought, emergency, or other unanticipated events, take appropriate steps to limit, reduce, or otherwise modify growth permitted by the Area Plan in consultation with water districts to ensure adequate long-term supply for existing businesses and residents.

USS-14 Upon the availability of non-potable water, discourage and consider restrictions on the use of potable water for washing outdoor surfaces.

USS-15 In cooperation with the Sanitation Districts and other affected agencies, expand opportunities for use of recycled water for the purposes of landscape maintenance, construction, water recharge, and other uses as appropriate.

Finding 3:

The AVIRWMP 2013 Update identifies the need for future conservation, recycled water, stormwater capture, water banking, and additional water supply projects to meet future demand through the 2035 planning period. Demand for water exceeds available supplies. In future single dry years, the supply demand mismatch is estimated to be 61,200 AFY. Water supplies necessary to serve buildout of the Project Area under the Proposed Project, which is expected to occur beyond the year 2035, have not been identified for the Project Area. Considering current water supply constraints – including the record 2013-2014 California drought – there is not sufficient water secured for the buildout of the Project Area under the Proposed Project. New water supplies would need to be secured, and therefore, impacts of the Proposed Project buildout on water supplies are significant.

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits,

including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

Cumulative Impacts: Water Supply

Support for this environmental impact conclusion is fully discussed starting on page 5.17-31 of Section 5.17, *Utilities and Service Systems*, of the DEIR.

Facts in Support of Finding:

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts,* the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas of Los Angeles County located within the Antelope Valley and Santa Clarita Valley areas, as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita.

As discussed above, projected water supplies in the Upper Santa Clara River IRWM Region are expected to be 202,057 AFY. The EIR for the Santa Clarita Valley Area Plan concluded that water supplies would be adequate for buildout of the Santa Clarita Valley Area Plan for the portions within the service area of the Castaic Lake Water Agency and/or within the East Subbasin of the Santa Clara River Valley Groundwater Basin after implementation of mitigation measures. However, impacts were identified as significant and unavoidable outside of those two areas.

No estimate of water supply beyond 2035 is available for the Antelope Valley IRWM Region. Therefore, even with planned future water supplies under consideration by Antelope Valley water agencies, water supplies in the Project Area would not be adequate to serve the buildout of the Project Area allowed by the Proposed Project. New and/or expanded water supplies would be required to meet such demands. This impact would be cumulatively significant.

Mitigation Measures:

See mitigation measures under Impact 5.17-3.

Finding 3:

The County finds that there are no mitigation measures that are feasible, taking into consideration specific economic, legal, social, technological or other factors, that would mitigate this impact to a less-than-significant level, and, further, that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the alternatives identified in the EIR, as discussed in Section IV of these Findings (Public Resources Code §§ 21081(a)(1), (3); Guidelines §§ 15091(a)(1), (3)). As described in the Statement of Overriding Considerations, the County has determined that this impact is acceptable because specific overriding economic, legal, social, technological, or other benefits, including regionwide or statewide environmental benefits, of the proposed project outweigh its significant effects on the environment.

IV. ALTERNATIVES TO THE PROPOSED PROJECT

A. ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in the DEIR.

Project Planning Alternatives

During the course of the Proposed Project, numerous variations in mapping were considered. The variations were a result of an iterative process of receiving input from stakeholders and County staff and refining the working maps that eventually became the Proposed Land Use Policy Map. While some of these previous variations would have represented the opinions of a segment of stakeholders more strongly or would have reduced environmental impacts more than the Proposed Project or other alternatives considered, they were not appropriate for analysis in the DEIR because they are no longer being pursued by the Lead Agency. They have since been refined or supplemented by the currently proposed Land Use Policy Map. Additionally, in 2010, an expert panel of biologists was convened to evaluate the SEA boundaries, and additional locations were identified as areas that warranted the SEA designation. The Proposed Project is consistent with the Proposed SEA Boundaries, which identifies seven SEAs in the Project Area that represent the wide-ranging biodiversity and contain its most important biological resources. Therefore, the Proposed Project and the alternatives that are analyzed in the DEIR were determined to provide the best scenarios to represent the different planning approaches that have been considered during the process.

No Growth/No Development Alternative

The No Growth/No Development Alternative would prohibit all new development, restricting urban growth to its current extent. No alterations to the unincorporated areas would occur (with the exception of previously approved or entitled development); all existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways, would generally remain in their current condition. Implementation of this alternative would not provide adequate housing supply to meet the County's obligations to provide its fair share of housing. By limiting development within Project Area, implementation of this alternative would increase development pressure in surrounding areas, including the Cities of Palmdale, Lancaster, and Santa Clarita, and Kern County. It should also be noted that this alternative would not achieve any of the objectives established for the Project. It would also expose the County to liability claims related to constitutional property rights. As a result, this alternative has been rejected from further consideration.

B. ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the Proposed Project, but that may avoid or substantially lessen any of the significant effects of the Proposed Project. These alternatives are analyzed in detail in the following sections:

- No Project/Adopted Area Plan Alternative
- Reduced Intensity Alternative
- Alternative Land Use Policy Map

An EIR must identify an "environmentally superior" alternative, and where the no project alternative is identified as environmentally superior, the EIR is required to identify an environmentally superior alternative from among the others evaluated. Each alternative's environmental impacts are compared to the Proposed Project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the Proposed Project. Section 7.7 of the DEIR identifies the Reduce Intensity Alternative as the Environmentally Superior Alternative.

Table 7-1 in Section 7.3.1 of the DEIR provides a summary of each project alternative.

No Project/Adopted Area Plan Alternative

This alternative, which is required by CEQA, assumes that the Adopted Area Plan and implementing zoning would remain unchanged. The Area Plan, originally adopted on December 4, 1986, would remain in effect, and no update to the Adopted Area Plan goals and policies would occur. This alternative also would not amend the existing SEA boundaries within the Project Area. Other key components of the Proposed Project, including the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, and Rural Preserve Areas, as well as EOAs, would also not occur under this alternative. Under the No Project/Adopted Area Plan Alternative, a total of 278,158 dwelling units (additional 253,419 units from existing), a total population of 1,070,571 (additional 977,081 persons from existing), and a total of 51,219 employees (additional 19,381 employees from existing) would occur at buildout.

The No Project/Adopted Area Plan Alternative would have similar impacts for geology and soils. However, impacts to all other categories would be increased, including significant impacts to agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, mineral resources, noise, transportation/traffic, and utilities and service systems (water supply).

Implementation of the No Project/Adopted Area Plan Alternative would allow future growth that may not be compatible with the current goals and objectives of the County. This alternative would not update the existing SEA boundaries within the Project Area. Since the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the smaller SEAs designated in the Adopted Area Plan. Other key components of the Proposed Project, including the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, Rural Preserve Areas, and EOAs also would not occur under this alternative. Specifically, the No Project/Adopted Area Plan Alternative does not concentrate future development near regional employment and activity centers, does not maintain jobs/housing balance, and does not promote multi-modal transportation, and therefore would be inconsistent with SCAG's RTP/SCS for the Project Area.

Finding:

The County finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make the No Project/Adopted Area Plan Alternative infeasible. (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of the Finding:

The No Project/Adopted Area Plan Alternative would have similar impacts for geology and soils. However, impacts to all other categories would be increased, including significant impacts to

agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, mineral resources, noise, transportation/traffic, and utilities and service systems (water supply).

Implementation of the No Project/Adopted Area Plan Alternative would allow future growth that may not be compatible with the current goals and objectives of the County. This alternative would not update the existing SEA boundaries. Since the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the smaller SEAs designated in the Adopted Area Plan. Other key components of the Proposed Project, including the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, Rural Preserve Areas, and EOAs also would not occur under this alternative. Specifically, the No Project/Adopted Area Plan Alternative does not concentrate future development near regional employment and activity centers, does not maintain jobs/housing balance, and does not promote multi-modal transportation, and therefore would be inconsistent with SCAG's RTP/SCS for the Project Area.

Reference: DEIR §§ 7.4, 7.4.18

Reduced Intensity Alternative

This alternative would reduce the overall additional development intensity by 30 percent within the Project Area as compared to the Proposed Project. Under the Reduced Intensity Alternative, a comprehensive update to the Adopted Area Plan goals and policies would occur, similar to the Proposed Project. Updates to the existing SEA boundaries based on the latest biological information and GIS mapping data would also occur. Other key components of the Proposed Project, including the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, Rural Preserve Areas, and EOAs would occur under this alternative. Under the Reduced Intensity Alternative, a total of 81,748 dwelling units (57,009 more than existing), a total population of 311,834 (218,344 more than existing), and a total of 103,597 employees (71,759 more than existing) would occur at buildout.

The Reduced Intensity Alternative would have similar impacts for agriculture and forestry resources, biological resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, mineral resources, and population and housing. Impacts would be reduced for aesthetics, air quality, GHG emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. In addition, while it would slightly reduce significant impacts with regard to agriculture and forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation/traffic, and utilities and service systems (water supply), these would remain significant and unavoidable.

This alternative would meet most of the project objectives identified in Section 7.1.2 of the DEIR, although not to the same extent. For instance, this alternative would involve adoption of the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, and Rural Preserve Areas, although allowable densities would be reduced as compared to the Proposed Project.

Finding:

The County finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make the Reduced Intensity Alternative infeasible. (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of the Finding:

The Reduced Intensity Alternative would have similar impacts for agriculture and forestry resources, biological resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, mineral resources, and population and housing. Impacts would be reduced for aesthetics, air quality, GHG emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. In addition, while it would slightly reduce significant impacts with regard to agriculture and forestry resources, air quality, biological resources, cultural resources, greenhouse gas emissions, mineral resources, noise, transportation/traffic, and utilities and service systems (water supply), these would remain significant and unavoidable.

This alternative would meet most of the project objectives identified in Section 7.1.2, although not to the same extent. For instance, this alternative would involve adoption of the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, and Rural Preserve Areas, although allowable densities would be reduced as compared to the Proposed Project.

Reference: DEIR §§ 7.5, 7.5.18

Alternative Land Use Policy Map

This Alternative proposes an alternative land use policy map for the Proposed Project. Under the Alternative Land Use Policy Map, a comprehensive update to the Adopted Area Plan goals and policies would occur, similar to the Proposed Project. Updates to the existing SEA boundaries based on the latest biological information and GIS mapping data would also occur. Other key components of the Proposed Project, including the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, and Rural Preserve Areas would also occur under this alternative. Under the Alternative Land Use Policy Map, a total of 67,463 dwelling units (42,724 more than existing), a total population of 248,323 (154,833 more than existing), and a total of 46,225 employees (14,387 more than existing) would occur at buildout.

The Alternative Land Use Policy Map would have similar impacts for geology and soils. Impacts would be reduced for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, land use and planning, mineral resources, noise, public services, recreation, transportation and traffic, and utilities and service systems. However, though it would slightly reduce significant impacts with regard to agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, mineral resources, noise, transportation/traffic, utilities and service systems (water supply), these would remain significant and unavoidable. In addition, this Alternative would result in one new significant impact related to population and housing.

This alternative would meet some but not all of the project objectives identified in Section 7.1.2 of the DEIR.

Finding:

The County finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make the Alternative Land Use Policy Map infeasible. (Public Resources Code § 21081(a)(3), Guidelines § 15091(a)(3)).

Facts in Support of the Finding:

The Alternative Land Use Policy Map would have similar impacts for geology and soils. Impacts would be reduced for aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, hazards and hazardous materials, land use and planning, mineral resources, noise, public services, recreation, transportation and traffic, and utilities and service systems. However, though it would slightly reduce significant impacts with regard to agriculture and forestry resources, air quality, biological resources, cultural resources, GHG emissions, mineral resources, noise, transportation/traffic, utilities and service systems (water supply), these would remain significant and unavoidable. In addition, this Alternative would result in one new significant impact related to population and housing.

This alternative would meet some but not all of the project objectives identified in Section 7.1.2.

Reference: DEIR §§ 7.6, 7.6.18

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**STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
ANTELOPE VALLEY AREA PLAN EIR**

STATE CLEARINGHOUSE NO. 2014061043

I. INTRODUCTION

The County is the Lead Agency under CEQA for preparation, review, and certification of the Final EIR for the Antelope Valley Area Plan. As the Lead Agency, the County is also responsible for determining the potential environmental impacts of the proposed action and which of those impacts are significant, and which can be mitigated through imposition of mitigation measures to avoid or minimize those impacts to a level of less than significant. CEQA then requires the Lead Agency to balance the benefits of a proposed action against its significant unavoidable adverse environmental impacts in determining whether to approve the proposed Project. In making this determination the City is guided by State CEQA Guidelines Section 15093 which provides as follows:

"CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal (sic) project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'

When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091."

In addition, Public Resources Code Section 21081(b) requires that where a public agency finds that specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in an EIR and thereby leave significant unavoidable effects, the public agency must also find that overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects of the project.

Pursuant to Public Resources Code Section 21081(b) and the State CEQA Guidelines Section 15093, the County has balanced the benefits of the proposed project against the following unavoidable adverse impacts associated with the proposed Project and has adopted all feasible mitigation measures with respect to these impacts. The County also has examined alternatives to the Proposed Project, none of which both meet the Project objectives and is environmentally preferable to the Proposed Project for the reasons discussed in the Findings and Facts in Support of Findings (Section IV of the CEQA Findings of Fact).

The Los Angeles County Board of Supervisors (the "Board"), the Lead Agency for this Project, having reviewed the Final EIR for the Antelope Valley Area Plan, and reviewed all written materials within the County's public record and heard all oral testimony presented at public hearings, adopts this Statement of Overriding Considerations, which has balanced the benefits of the Project against its significant unavoidable adverse environmental impacts in reaching its decision to approve the Project.

II. SIGNFICANT UNAVOIDABLE ADVERSE ENVIRONMENTAL IMPACTS

Although some potential project impacts have been substantially avoided or mitigated, as described in the Findings and Facts in Support of Findings, there remain some project impacts for which complete mitigation is not feasible. For some impacts, mitigation measures were identified and adopted by the Lead Agency, however, even with implementation of the measures, the County finds that the impact cannot be reduced to a level of less than significant. The impacts and alternatives are described below and were also addressed in the Findings.

The EIR identified the following unavoidable adverse impacts of the proposed project:

A. Agriculture and Forestry Resources

- Buildout of the Project Area allowed by the Proposed Project would convert California agency-designated farmland to non-agricultural uses.

- Buildout of the Project Area allowed by the Proposed Project would involve other changes in the existing environment that could result in conversion of farmland to non-agricultural use or conversion of forest land to nonforest use.

B. Air Quality

- The Proposed Project would generate less growth than the Adopted Area Plan; however, it would not be consistent with the SCAQMD's and AVAQMD's air quality management plans because buildout of the Proposed Project would cumulatively contribute to the nonattainment designations of the SoCAB and MDAB.

- Construction activities associated with the buildout of the Project Area allowed by the Proposed Area Plan would generate a substantial increase in short-term criteria air pollutant emissions that exceed the SCAQMD and AVAQMD significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

- Long-term implementation and operation of development allowed by the Proposed Project would generate a substantial increase in criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB.

- Buildout of the Proposed Project could result in new source sources of criteria air pollutant emissions and/or toxic air contaminants proximate to existing or planned sensitive receptors.

C. Biological Resources

- Development associated with buildout of the Project Area allowed by the Proposed Project would impact, either directly or through habitat modifications, species identified as

candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the CDFW or USFWS.

- Development associated with buildout of the Project Area allowed by the Proposed Project would result in the loss of riparian habitat or sensitive natural communities identified in local or regional plans, policies, or regulations or by the CDFW or USFWS.

- The Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

D. Cultural Resources

- Development associated with development of the Project Area allowed by the Proposed Project could impact historic resources.

E. Greenhouse Gas Emissions

- Buildout of the Proposed Project would result in a substantial increase in GHG emissions compared to existing conditions and would also not meet the long-term GHG reduction goal under Executive Order S-03-05.

F. Mineral Resources

- Development in accordance with the buildout of the Project Area allowed by the Proposed Project would cause the loss of availability of known mineral resources in the Project Area.

- Buildout of the Project Area allowed by the Proposed Project would cause a loss of availability of mineral resources in the Little Rock Wash area, which is designated for mineral extraction in the Adopted General Plan.

G. Noise

- Buildout of the Proposed Project would result in an increase in traffic on local roadways in the Project Area, which would substantially increase the existing ambient noise environment.

H. Transportation and Traffic

- Buildout in accordance with the Proposed Project would impact levels of service on the existing roadway system.

I. Utilities and Service Systems

- Water supply and delivery systems are not adequate to meet Proposed Project's requirements in the Project Area beyond 2035.

III. ALTERNATIVES

The EIR evaluated three alternatives to the project and analyzed whether these alternatives could avoid or substantially lessen the unavoidable environmental impacts of the proposed project. The Reduced Intensity Alternative was determined to be environmentally superior to the project. Some of the alternatives lessened some of the unavoidable impacts of the proposed project and resulted in different or increased environmental impacts. However, none of the alternatives eliminated the

significant and unavoidable impacts of the Proposed Project nor meet all of the Project's objectives. Therefore, the County rejects those alternatives.

IV. CONSIDERATIONS IN SUPPORT OF THE STATEMENT OF OVERRIDING CONSIDERATIONS

The following section describes the benefits of the project that outweigh the project's unavoidable adverse effects and provides specific reasons for considering the project acceptable even though the Final EIR has indicated that there will be significant project impacts that are infeasible to mitigate.

A. Implements the Objectives Established for the Project

The County established the following objectives for the Antelope Valley Area Plan project to aid decision-makers in their review of the project and associated environmental impacts:

- Preservation and enhancement of each unique town's rural character, allowing for continued growth and development without compromising the rural lifestyle.

- Preservation of open space around existing towns in order to preserve hillside areas and significant ridgelines, conserve biological resources, provide opportunities for recreation, and make more efficient use of existing infrastructure in the core areas.

- Planning for integrated circulation systems, including bikeways, walkways, and multi-purpose trails.

- Conservation of significant resources, including agricultural lands, mineral resources, water supply, and scenic areas.

- Preservation of public health, safety, and welfare, through identification of natural and environmental hazards, including noise, seismic, fire, and airborne emissions, and designation of land uses in an appropriate manner to mitigate these impacts; and

- Coordination on enhancing public and community services such as law enforcement, fire protection, and parks.

- Provide a balance of jobs and housing consistent with AB 32, SB 375, and SCAG's RTP/SCS.

Implementation of the Proposed Project would achieve these objectives.

B. Represents a Guiding Framework for Future Development

Even without the implementation of the Antelope Valley Area Plan, SCAG projects population growth in the region to dramatically increase between existing conditions and 2035. This population increase will require development to accommodate housing, employment, and public service needs. Development in the Antelope Valley is inevitable. The Antelope Valley Area Plan would shape development and protect resources while creating compatibility between the existing and proposed land uses. Without a comprehensive guiding framework of planning principles to outline development within the Project Area and concentrate development within the focus areas, development would occur under the Adopted Area Plan without consistent goals. The Proposed Project would help maintain balanced land uses, the phasing of development to ensure appropriate

timing and placement of utilities and services, and create a stronger sense of community than would occur without this type of planning document.

However, the Proposed Area Plan is more than just a policy and land use plan; it has components that are meant to guide government and community interaction and maintain the future sustainability of the economic, physical, and social development goals. The Proposed Area Plan is a living document designed to adjust continuously to new opportunities and challenges. Through the continual upkeep of the Proposed Area Plan, the County's approach to development throughout the project area would be comprehensive and unified.

C. Improves Quality of Life and the Physical Environment

Although development in the Antelope Valley would have significant impacts on the environment (such as those on agriculture, air quality, biological resources, cultural resources, greenhouse gas emissions, noise, and transportation), a number of the policies would reduce these impacts on the environment and promote more environmentally sustainable development than would otherwise result in the development of the region. These types of policies include those that:

- Manage the roadway network and encourage multimodal and complete streets system of transportation: Mobility (M) Policies 1.1 through 1.5; 2.1 through 2.6; 3.1 through 3.6; 4.1 through 4.3; 5.1 through 5.5; 6.1 through 6.9; 7.1 through 7.5; 8.1 through 8.2; 9.1 through 9.4; 10.1 through 10.8; and 11.1 through 11.5.

- Maintain and conserve natural resources and agricultural resources: Conservation and Open Space (COS) Policies 1.1 through 1.4; 2.1 through 2.8; 3.1 through 3.5; 4.1 through 4.10; 5.1 through 5.7; 6.1 through 6.8; 7.1 through 7.4; 8.1 through 8.6; 9.1 through 9.8; 10.1 through 10.6; 11.1 through 11.3; 12.1 and 12.2; 13.1 through 13.8; and 14.1 through 14.7; 15.1 through 15.4; 16.1 and 16.2; 17.1 through 17.9; 18.1 through 18.5; and 19.1 through 19.4; Land Use (LU) Policies 2.1 through 2.6.

- Encourage health and wellness: Public Safety (PS) Policies 4.1 through 4.4; 5.1 through 5.5; 6.1 through 6.6; and 12.1 through 12.5.

- Improve air quality and reduce greenhouse gas emissions: Conservation and Open Space (COS) Policies 9.1 through 9.8.

- Promote water quality: Conservation and Open Space (COS) Policies 2.1 through 2.8 and 3.1 through 3.5.

- Promote opportunities for economic development: Economic Development (ED) Policies 1.1 through 1.21.

D. The Proposed Project is Considered Environmentally Superior to Continuation of the Adopted Area Plan

Continuation of Adopted Area Plan would allow future growth that may not be compatible with the current goals and objectives of the County. The Adopted Area Plan would not update the existing SEA boundaries within the Project Area. Since the updated SEA boundaries are based on the latest biological information and GIS mapping data, they are considered biologically superior to the smaller

SEAs designated in the General Plan within the Project Area. Other key components of the Proposed Project, including the Rural Preservation Strategy and establishment of the Rural Town Center, Rural Town Areas, Rural Preserve Areas, and EOAs also would not occur under the Adopted Area Plan. Specifically, the Adopted Area Plan does not concentrate future development near regional employment and activity centers, does not maintain jobs/housing balance, and does not promote multi-modal transportation, and therefore would be inconsistent with SCAG's RTP/SCS for the Project Area.

E. Conclusion

For the abovementioned reasons, adoption and implementation of Proposed Area Plan would have environmental, economic, and social benefits that outweigh the unavoidable adverse environmental impacts of the physical development of the Project Area. Implementation of the Proposed Project would help attain regional goals for land use, transportation, and economic stability; require environmentally sustainable development; and provide a guiding framework for future development. Therefore, the County of Los Angeles has adopted this Statement of Overriding Considerations.